GFL ENVIRONMENTAL INC

2025 CDP Corporate Questionnaire 2025

(for the 2024 reporting year)

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ CAD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

GFL Environmental Inc., (together with its consolidated subsidiaries, in this Questionnaire referred to collectively as "GFL", "we", "our" or "us"), headquartered in Ontario, Canada, provides comprehensive non-hazardous solid waste management services throughout Canada and in more than half of the states in the U.S. Since our inception in 2007, GFL has grown to be the fourth largest environmental services provider in North America through a combination of organic growth and strategic acquisitions. We provide accessible, cost-effective, sustainable solutions to manage waste streams that are generated by households, as well as by commercial, industrial, and institutional businesses across our operations that include, as of December 31, 2024, 220+ collection operations, 175+ transfer stations, 90+ landfills, 30+ material recovery facilities, 12 soil remediation facilities, 20+ organics facilities and 150+ liquid waste facilities. As of December 31, 2024, we employed more than 20,000 employees and had more than 7,100 routed solid waste collection vehicles to service our customers. For the year ended 2024, the services we provided to our customers resulted in more than 12 million tonnes of GHG emissions avoided and carbon sequestered (as CO2e) in our landfills, and we managed approximately 3 million tonnes of recyclable materials. As a provider of environmental solutions, we are uniquely positioned to help our customers and the communities we serve reduce their own carbon footprint with the waste diversion and reuse services and products we provide like recycling, material recovery, composting, and landfill gas capture and use. Our products and services directly support the transition from a 'take-make-waste' extractive economy to a more circular one. Not only do these services allow GFL to be a meaningful participant in the circular economy by providing recyclable raw materials that reduce our customers' need for virgin materials, but they also help our customers reduce their GHG emissions. Our Sustainability Action Plan, which we released in 2022,

includes a comprehensive set of sustainability-related goals, targets, and commitments that support our ambition to be recognized as a circular economy and climate leader in our industry. We are committed to our climate leadership goals that focus on investing in the technologies and practices that reduce our own GHG emissions, primarily from our landfills and our fleet. We have identified and are implementing an ambitious, achievable, and transparent pathway to reduce our own GHG emissions. In 2024, we increased our GHG emissions reduction target to a 30% absolute reduction in total scope 1 and 2 GHG emissions by 2030 from a 2021 base year. The approach we used to identify our increased target is derived from the separate science-aligned pathways for the different types of emissions that are generated in our operations. The corresponding pillars of our target are: a 30% decrease in methane emissions from landfills aligned with the Global Methane Assessment, a 42% decrease in fleet emissions aligned with the SBTi, and 100% use of renewable energy at GFL-owned facilities aligned with the International Energy Agency's pathway to Net Zero. We are the first in our industry to adopt this type of hybrid approach to setting targets that are aligned with multiple key science-based assessments. Since releasing our target, we worked with a third party, which concluded that our targets and approach are consistent with the science-aligned pathways described above, including those limiting global warming to 1.5 degrees Celsius. SUBSEQUENT EVENTS: Data presented in this response is for the 2024 calendar year. Changes to our disclosures to exclude information regarding our Environmental Services business that was sold effective March 3, 2025, will be reflected beginning with our reporting for the 2025 calendar year. Impacts to our governance from the sale of our Environmental Services business, primarily the removal of Environmental Services executive/senior staff from relevant committees, have been made in our response to reflect GFL's current governance structure. [Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☑ 3 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 3 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 3 years
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

$7,862,000,000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

CA36168Q2036 CA36168Q1046CA36168Q5005 CA36168Q1384

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

36168Q203, 36168Q104, 36168Q500, 36168Q138

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

GFL

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No
[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☑ Canada

☑ United States of America

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

☑ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 2 suppliers

(1.24.7) Description of mapping process and coverage

The processes we use to map our supply chain includes our enterprise risk management process, materiality assessments, annual greenhouse gas (GHG) emissions accounting and with the assistance of a third-party supply chain monitoring system, monitoring suppliers for activities that could violate our Supplier Code of Conduct or cause us reputational damage. GFL's enterprise risk management process includes our Emerging and Evolving Risk Committee. The purpose of the committee is to regularly engage with representatives from key areas of the business to review risks impacting individual departments and business units, as well as key emerging risk trends. Topics covered include operational, financial, strategic, reputational, employee, health and safety, legal and regulatory, information technology and sustainability-related risks and opportunities, including those within our upstream and downstream supply chain. This process, informed by the processes listed above, contribute to our value chain mapping.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

☑ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

GFL does not engage in the direct production or use of plastics in its products or services. However, as North America's fourth largest environmental services provider, GFL plays a critical role in the end-of-life management of plastics produced by others and plastics circularity through our recycling services. In 2024, our material recovery facilities and other GFL facilities recovered over 180,000 tonnes of plastics.
[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Short-term time horizon is aligned with broader operational, financial, and strategic planning timeframes.

Medium-term

(2.1.1) From (years)

3

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Medium-term time horizon is aligned with capital decisions related to fleet.

Long-term

(2.1.1) From (years)

10

(2.1.2) Is your long-term time horizon open ended?

Select from:
☑ No

(2.1.3) To (years)

30

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Long-term time horizon is aligned with larger infrastructure capital decision including material recovery facilities, organics processing facilities, landfills and landfill renewable energy facilities.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Not defined

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ A specific environmental risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

☑ Internal company methods

International methodologies and standards

☑ Environmental Impact Assessment

☑ IPCC Climate Change Projections

Other

☑ Scenario analysis

☑ Desk-based research

☑ External consultants

☑ Materiality assessment

☑ Internal company methods

☑ Jurisdictional/landscape assessment

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Wildfires

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Heat waves
☑ Cold wave/frost
☑ Cyclones, hurricanes, typhoons
☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical
☑ Water stress
☑ Sea level rise
☑ Temperature variability
☑ Precipitation or hydrological variability
☑ Increased severity of extreme weather events
☑ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy
☑ Carbon pricing mechanisms
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation
☑ Increased difficulty in obtaining operations permits
☑ Other policy, please specify: Changes to other environmental laws that may impact our business.

Market
☑ Changing customer behavior
☑ Other market, please specify: Fluctuations in commodity prices.

Reputation
☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback
☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
☑ Stigmatization of sector

Technology
☑ Data access/availability or monitoring systems
☑ Transition to lower emissions technology and products
☑ Unsuccessful investment in new technologies

Liability

☑ Exposure to litigation

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

☑ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

GFL identifies, assesses, and responds to climate-related risks and opportunities through both specific climate-related risk management processes as well as certain risk management processes that are integrated into various company-wide business functions, systems, and processes. The summary below describes our specific climate-related risk management processes. Through a two-year engagement completed at the end of 2022 and under the direction of GFL's Sustainability Initiatives Committee (SUSIC), GFL's sustainability team conducted a systematic review of the functional areas of the business listed below, to identify the risks and opportunities for that functional area. This review included a focus on operational emissions and resulted in the GHG reduction targets that GFL adopted as part of our Sustainability Action Plan to mitigate our climate-related risks in the short term, as well as the targets we set to continue to grow the services we provide that help our customers avoid GHG emissions. The functional areas where climate is considered are Fleet & Procurement (fleet type, fuel and electricity use), Recycling (material recovery facilities), Post Collections Support (landfills and transfer stations), Renewables (landfill gas to energy facilities), Environment, Health & Safety and Compliance, Corporate Development, Legal, Insurance and Operations. GFL also engaged a third-party consulting firm to conduct a climate-related risk/opportunity assessment that focused on physical and transition risks of GFL's assets and business operations in the short, medium, and long term. The risks identified through the risk assessment with the potential to be pervasive risks are integrated into our enterprise risk management process through our Emerging and Evolving Risk Committee (EERC).

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ More than once a year

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

☑ Internal company methods

International methodologies and standards

☑ Environmental Impact Assessment

Other

☑ Desk-based research

☑ Jurisdictional/landscape assessment
☑ Materiality assessment
☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical
☑ Drought
☑ Tornado
☑ Wildfires
☑ Heat waves
☑ Cold wave/frost
☑ Cyclones, hurricanes, typhoons
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)
☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical
☑ Changing precipitation patterns and types (rain, hail, snow/ice)
☑ Increased severity of extreme weather events
☑ Precipitation or hydrological variability
☑ Water stress
☑ Water quality at a basin/catchment level

Policy
☑ Carbon pricing mechanisms
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation
☑ Increased difficulty in obtaining operations permits
☑ Other policy, please specify: Changes to other environmental laws that may impact our business.

Market
☑ Changing customer behavior
☑ Other market, please specify: Fluctuations in commodity prices.

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

☑ Stigmatization of sector

Technology

☑ Data access/availability or monitoring systems

☑ Transition to lower emissions technology and products

☑ Unsuccessful investment in new technologies

Liability

☑ Exposure to litigation

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

☑ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ No

(2.2.2.16) Further details of process

GFL identifies, assesses, and responds to climate-related risks and opportunities through both specific climate-related risk management processes as described above as well as certain risk management processes that are integrated into various company-wide business functions, systems, and processes. Addressing climate-

related risks and opportunities is an inherent part of the following business functions, systems, and processes: capital planning for landfills, fleet, and other facilities, environmental management system, Safe for Life Program, quarterly operating business reviews, annual budget reviews, Environmental Innovation Program, supply chain management, and business impact analysis. For example, risks and opportunities related to severe weather events are included in capital planning, our environmental management system, our Safe for Life program, as well as our business impact analysis, budget reviews, and quarterly operating reviews. Unique to the waste industry, because we offer environmentally responsible collection, recycling, and disposal of waste materials, severe weather events present both a potential risk to our physical assets and our employees which we can mitigate through appropriate planning, but also an opportunity for us to help our communities recover as GFL is often contracted to collect, recycle and dispose of storm debris. GFL's day to day business operations are managed at the local or asset level. As part of their focus on strategic and business planning, our local managers continuously assess the strengths, risks, and opportunities impacting their local business, including potential acquisition opportunities, competitive pressures, organic growth plans such as recycling or compost diversion opportunities, market dynamics and pricing, and the potential impact of existing and proposed legislation and regulatory changes such as the introduction of Extended Producer Responsibility (EPR) regimes that encourage greater materials recycling. The local assessment of these risks and opportunities is reviewed annually at the corporate level through our annual budgeting process. Our executive and senior management teams that are responsible for both our corporate as well as our field level assets also meet regularly and at minimum in our quarterly operating reviews, to review and discuss our business strategy and identify trends impacting the business as a whole and in various regions of our business, as well as best practices to address those risks and opportunities, including risks to be address or opportunities to be pursued by us. Our Sustainability and ERM teams each play a central role in these discussions at the local and corporate level by working to identify and highlight to our local and senior managers the opportunities available to GFL to progress our climate goals. The Sustainability team leads the engagement with third-party consultants to conduct our climate-related risk and opportunity assessments. The risks identified through this work, with the potential to be pervasive, are integrated into our enterprise risk management process through our Emerging and Evolving Risk Committee (EERC). Risks that can potentially have substantive climate-related financial impacts and require immediate attention are brought to the attention of the Risk Management Steering Committee (RMSC) and SUSIC, where appropriate. [Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

As a provider of environmental solutions, we are uniquely positioned to help our customers and the communities we serve reduce their own carbon footprint with the waste diversion and reuse services and products we provide like recycling, material recovery, composting, and landfill gas capture and use. Our products and services directly support the transition from a 'take-make-waste' extractive economy to a more circular one. Not only do these services make GFL a meaningful participant in the circular economy by providing recyclable raw materials and renewable natural gas that reduce our customers' dependence on virgin materials and natural gas, but they also help our customers reduce their GHG emissions and in the case of our renewable natural gas facilities also support GFL's Sustainability Action Plan to reduce our own GHG emissions from our landfills. With this in mind, the approach we use to assess interconnections is to prioritize the actions we take to manage environmental and climate-related risks and opportunities with those that both enhance the sustainable environmental solutions we provide to our

customers, support the achievement of our own climate-related goals and commitments and add significant value to our business. The processes we use to assess these interconnections include our annual budgeting process, operations-level environmental risk assessments, our environmental innovation program, enterprise risk management processes, and climate-related risks and opportunities assessments. An example of an interconnection that we identified is the conversion of a portion of our solid waste collection fleet to CNG vehicles generating a positive return on investment (ROI) and helping us reduce potential impacts from fuel cost increases due in part to new or evolving climate-related policy. Section 3.1.1.1 provides additional details about this risk and our response.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ No, but we plan to within the next two years

(2.3.7) Primary reason for not identifying priority locations

Select from:

☑ Not an immediate strategic priority

(2.3.8) Explain why you do not identify priority locations

We are in the process of assessing the application of the TNFD recommendations, that were finalized in the fall of 2023, and how to implement them effectively in our business.
[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ Absolute decrease

(2.4.5) Absolute increase/ decrease figure

$40,000,000

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

At an individual risk or opportunity level, we consider impacts associated with revenue, direct and indirect operating costs, asset value, and capital expenditures greater than $40M. Strategic impacts and indirect financial impacts considered include: 1) reputational impacts affecting stakeholder relationships, 2) operational impacts affecting business processes, systems, health and safety, or resulting in unplanned downtime, 3) people impacts related to employee engagement, productivity, and displacement, 4) strategic impacts related to the impact on transaction outcomes and customer satisfaction and, 5) legal impacts related to damages or regulatory consequences, such as fines or suspension or curtailment of operations. Depending upon the severity of the impact, any of these impacts alone or in combination could have a substantive financial or strategic impact on our business.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative
☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:
☑ EBITDA

(2.4.3) Change to indicator

Select from:
☑ Absolute increase

(2.4.5) Absolute increase/ decrease figure

$40,000,000

(2.4.6) Metrics considered in definition

Select all that apply
☑ Frequency of effect occurring
☑ Time horizon over which the effect occurs
☑ Likelihood of effect occurring

(2.4.7) Application of definition

At an individual risk or opportunity level, we consider impacts associated with revenue, direct and indirect operating costs, asset value, and capital expenditures greater than $40M. Strategic impacts and indirect financial impacts considered include: 1) reputational impacts affecting stakeholder relationships, 2) operational impacts affecting business processes, systems, health and safety, or resulting in unplanned downtime, 3) people impacts related to employee engagement, productivity and displacement, 4) strategic impacts related to impact on transaction outcomes and customer satisfaction and, 5) legal impacts related to damages or regulatory consequences, such as fines or suspension or curtailment of operations. Depending upon the severity of the impact, any of these impacts alone or in combination could have a substantive financial or strategic impact on our business.
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

GFL does not engage in the direct production or use of plastics in its products or services. However, as North America's fourth largest environmental services provider, GFL plays a critical role in the end-of-life management of plastics produced by others and plastics circularity through our recycling services. In 2024, our material recovery facilities and other GFL facilities recovered over 180,000 tonnes of plastics.
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Canada

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Various levels of government in the U.S. and Canada have implemented, or are considering implementing, a price on carbon through mechanisms including carbon taxes on fuel, low-carbon fuel standards, and cap-and-trade systems. In 2024, fuel used by GFL in our fleet and non-fleet vehicles was subject to a carbon tax in jurisdictions across Canada where we operate. The federal carbon charge in Canada was removed effective April 1, 2025.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Likely

(3.1.1.14) Magnitude

Select from:

☑ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

GFL uses fleet and non-fleet vehicles in our operations, which as of December 31, 2024 included over 7,100 solid waste collection vehicles. The price and supply of diesel fuel can fluctuate significantly based on international, political, and economic circumstances, as well as other factors outside of our control, including carbon pricing mechanisms. A significant increase in the price of fuel that we are unable to pass along to our customers through our fuel surcharge programs could increase our operating costs and reduce our operating margins. GFL has also operated with a carbon tax pricing regime in effect across Canada for more than 5 years, which has not had a significant negative financial impact on our business.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

63000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

$104,400,000

(3.1.1.25) Explanation of financial effect figure

Our climate analysis for this risk includes evaluating both carbon and fuel pricing scenarios published by the International Energy Agency (IEA) and the Network for Greening the Financial System (NGFS). This assessment quantified the potential increase in our fleet fuel costs resulting from the transition to a low-carbon economy. We considered two climate scenarios: the 1.5C 'Net Zero' scenario from both the IEA and NGFS, and the 2.5C 'Stated Policies' scenario from the IEA, along with the 'Nationally Determined Contribution' (NDC) scenario from the NGFS. The analysis also considered GFL's ability to mitigate this risk by comparing costs under two business scenarios: a low-mitigation, 'business as usual' scenario, which assumes no progress toward our alternative fuel vehicle goals, and a high-mitigation scenario aligned with GFL's Sustainability Action Plan, where we meet the targets we have set for alternative fuel vehicle conversion. Using this methodology, we estimated a potential annual fuel cost increase ranging from 19% to 31% by 2030, compared to 2024 levels (under the 2.5C and 1.5C scenarios, respectively), if we maintain our current level of alternative fuel vehicles within our solid waste collection fleet (i.e., the business-as-usual scenario). However, if we implement the fleet conversion in line with our Sustainability Action Plan and account for additional positive return on investments from the revenue portion of RNG that we produce and dispense as well as applicable credit value, the financial impact is significantly reduced (1% in the 1.5C scenario) or may even present an opportunity for GFL under the 2.5C scenario.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☑ Other compliance, monitoring or target, please specify: 50% of annual solid waste fleet replacements to be with CNG or alternative fuel vehicles and using RNG fuel in at least 85% of our CNG solid waste fleet in the United States by 2030

(3.1.1.27) Cost of response to risk

$8,800,000

(3.1.1.28) Explanation of cost calculation

To respond to this risk, we estimate that we would allocate about $8.8M per 100 trucks in incremental capital to purchase CNG vehicles and upgrade truck maintenance shops to service CNG vehicles between 2024 and 2030 (6-year period). The positive return on investment (ROI) from this fleet transition effort is estimated to be approximately $9.6M per 100 trucks over the 6-year period using 2024 inputs. Between 2024 and 2030 (a 6-year period) we estimate upgrading between 1500 and 2000 trucks.

(3.1.1.29) Description of response

Our solid waste surcharge pricing strategy is implemented across the business to recover fuel and other environmental compliance costs and allows us to manage our fuel costs in areas with existing or anticipated carbon tax systems. In addition, as part of our Sustainability Action Plan, we have established goals of 50% of annual solid waste fleet replacements to be with CNG or alternative fuel vehicles and at least 85% of our CNG solid waste fleet in the United States to be powered by renewable natural gas, including RNG produced at our own landfills, by 2030. Using lower carbon fuels will help mitigate the compliance cost in jurisdictions applying a carbon tax on fuels used in the transportation sector. Also included in our Sustainability Action Plan is a commitment as part of our innovation program to continue to pilot the latest advancements in electric and hydrogen-powered vehicles and develop a longer-term roadmap to a zero-emissions fleet. We will continue to monitor emerging environmental and climate legislation that drives our transition to alternative fuel vehicles. Through our membership in organizations like the National Waste and Recycling Association (NWRA) and national trucking associations, we also comment on evolving legislation to communicate the perspective of the waste sector. We also periodically enter into fuel hedging agreements and fixed price fuel purchase contracts as part of our fuel costs management strategy. Fleet fuel emissions account for nearly 15% of our 2021 base year scope 1 and 2 emissions. Upstream generation emissions associated with purchased electricity account for all our scope 2 emissions. These emission sources are included in the carbon dioxide emissions portion of our updated target. We have set a fleet emissions reduction target of 42% by 2030 from a 2021 base year, aligned with the SBTi.
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:
☑ Other, please specify: Cost of sales.

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

$332,800,000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:
☑ 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ Less than 1%

(3.1.2.7) Explanation of financial figures

At an individual risk or opportunity level, we consider climate-related financial impacts associated with revenue, direct and indirect operating costs, asset value, and capital expenditures to be substantive if they are greater than $40M in a fiscal year. Using a fuel price forecasting methodology, and the scenarios published by the IEA, our analysis estimated the potential financial impact could be 19 to 31% higher fuel costs (NDC vs Net Zero scenario, respectively) by 2030 if we were to maintain our current level of alternative fuel vehicles within our solid waste collection fleet. 31% of 2024 fuel costs is $104,400,000. The percentage of total cost of sales (reported in our Annual Report) is 2%.
[Add row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply

☑ BC carbon tax

☑ Canada federal fuel charge

☑ Northwest Territories carbon tax

(3.5.3) Complete the following table for each of the tax systems you are regulated by.

BC carbon tax

(3.5.3.1) Period start date

01/01/2024

(3.5.3.2) Period end date

12/31/2024

(3.5.3.3) % of total Scope 1 emissions covered by tax

0

(3.5.3.4) Total cost of tax paid

$1,042,553

(3.5.3.5) Comment

The British Columbia (BC) carbon tax is applied to heavy fuel oil and light fuel oil sold in BC. In 2024, the total tax paid was on light and heavy fuel oil sold by GFL as part of our environmental services operations.

Canada federal fuel charge

(3.5.3.1) Period start date

01/01/2024

(3.5.3.2) Period end date

12/31/2024

(3.5.3.3) % of total Scope 1 emissions covered by tax

0

(3.5.3.4) Total cost of tax paid

$5,703,438

(3.5.3.5) Comment

The Canada federal fuel charge is applied to light and heavy fuel oil sold in Alberta, Manitoba, New Brunswick, Newfoundland and Labrador, Nova Scotia, Ontario, Prince Edward Island, and Saskatchewan. The total cost of tax paid is on fuel oil sold by GFL and does not include fuels purchased for use in operations.

Northwest Territories carbon tax

(3.5.3.1) Period start date

01/01/2024

(3.5.3.2) Period end date

12/31/2024

(3.5.3.3) % of total Scope 1 emissions covered by tax

4

(3.5.3.4) Total cost of tax paid

$10,284

(3.5.3.5) Comment

The Northwest Territories (NT) carbon tax is applied to heavy fuel oil and light fuel oil sold in the NT. The total cost of tax paid is on fuel oil sold by GFL and does not include fuels purchased for use in operations.
[Fixed row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Other products and services opportunity, please specify: Growth in recycling services and the production of clean fuel (RNG) from landfill gas.

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Canada

☑ United States of America

(3.6.1.8) Organization specific description

We provide our customers with waste diversion and reuse services and products like recycling, material recovery, and composting. In our direct operations, growth in materials recycled and landfill gas capture and beneficial use (including the generation of low-carbon products such as renewable natural gas) provides business opportunities. Together, these products and services directly support the transition from a 'take-make-waste' extractive economy to a more circular one. Not only do these products and services allow us to be a meaningful participant in the circular economy, but they also help our customers reduce their GHG emissions. Our circular economy-related goals focus on growing these services and products.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify: Increased revenue, adjusted EBITDA and free cash flow

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Our investments in recycling and conversion of landfill gas to energy will generate incremental revenue, EBITDA, and free cash flow.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ Yes

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

$160,000,000

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

$190,000,000

(3.6.1.23) Explanation of financial effect figures

The financial effects for the RNG-related and recycling-related investments represent the 2028 estimated incremental Adjusted EBIDTA run-rate contribution.

(3.6.1.24) Cost to realize opportunity

$325,000,000

(3.6.1.25) Explanation of cost calculation

We have allocated up to $325M of incremental growth capital expected to be deployed in 2025 to support our recycling and RNG related investments. This capital represents a portion of what we expect will be required to realize the total opportunity from our recycling and RNG-related investments.

(3.6.1.26) Strategy to realize opportunity

Our strategy related to realizing opportunities in recycling and producing renewable energy is outlined in our Sustainability Action Plan. The pathway to meeting our goal of increasing our recyclables recovered by 40% by 2030 is through increasing the volume of recyclables received at our material recovery facilities, continuing to make investments in sophisticated sorting technologies, and expanding our sorting capacity to meet increasing customer demand at existing and to-be-constructed facilities. The recycling opportunity described here will help us achieve our material recovery goal. Our goal to double the beneficial use of biogas from our landfills will be achieved through the development of landfill gas to energy facilities at eligible landfills across our footprint. The RNG opportunity described here will help us achieve our beneficial use of biogas goal.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☑ Other, please specify: Adjusted EBITDA

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

$2,250,500,000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ 1-10%

(3.6.2.4) Explanation of financial figures

Incremental recycling and RNG-related investments are expected to generate approximately $160 to $190 million of incremental run-rate Adjusted EBITDA in the near term. The incremental Adjusted EBITDA that we expect will be generated from these opportunities represents approximately 8% of our total Adjusted EBITDA as reported for our fiscal year ended December 31, 2024, of $2,250.5 million and 10% of our total run rate Adjusted EBITDA in 2028 including realization of the incremental run rate Adjusted EBITDA from our investments in RNG and excluding the Environmental Services business which was divested in March 2025.

Climate change

(3.6.2.1) Financial metric

Select from:

☑ CAPEX

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

$325,000,000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ 21-30%

(3.6.2.4) Explanation of financial figures

In 2025, approximately $325 million of incremental growth capital is expected to be deployed related to renewable natural gas projects, material recycling facilities and other infrastructure primarily related to opportunities arising under extended producer responsibility legislation. This is approximately 27% of the $1,193M spent in 2024 related to the purchase of property and equipment.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

GFL recognizes the importance and benefit of having a board of directors (the "Board") composed of highly talented, qualified and experienced individuals. The policy has been drafted to support this goal in compliance with applicable laws, regulations or other legal requirements.

(4.1.6) Attach the policy (optional)

GFL-Inclusion-Policy-February-24-2025.pdf

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ Yes

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:
☑ No, and we do not plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:
☑ Other, please specify: Standards to assess nature-related risks are still new

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

We are in the process of assessing the application of the TNFD recommendations, that were finalized in the fall of 2023, and how to implement them effectively in our business.
[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Board Terms of Reference

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Reviewing and guiding annual budgets
☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding public policy engagement
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Monitoring compliance with corporate policies and/or commitments
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Other, please specify: Overseeing and guiding employee incentives
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives
☑ Overseeing and guiding major capital expenditures
☑ Monitoring the implementation of the business strategy
☑ Overseeing and guiding the development of a business strategy

(4.1.2.7) Please explain

The Board of Directors meets on a quarterly basis, with additional meetings called periodically as required to address specific issues as they arise. On a quarterly basis, the Board reviews our strategy, budgets, and business plans for our business services, which include our materials recovery and recycling services and renewable energy projects at our landfills. The Board's oversight of climate-related issues includes major capital expenditures that may have impacts on our GHG footprint as well as the services we offer in certain markets. Major capital expenditures include acquisitions and investments in infrastructure that will help us achieve our Sustainability Action Plan goals. Examples of such investments include: CNG vehicles, including those that are fueled by RNG from our own landfill gas, the development of renewable natural gas facilities at our landfills, investments in new technologies at our material recovery facilities to increase our recovery rates, and the development of new material recovery facilities or organics processing facilities. In 2024, the Board met seven times. GFL's NGC Committee of the Board is responsible for providing guidance to management and GFL's Sustainability Initiatives Committee (SUSIC) in monitoring the implementation of our Sustainability Action Plan and our progress towards achieving the goals, targets, and commitments we have made in the time frames in which they are to be achieved. With our Sustainability Action Plan in place, the SUSIC reports on our progress to the NGC Committee semi-annually. As part of its annual review of the short-term compensation to be awarded to our five most senior executive officers, the NGC Committee assesses the performance of those officers against the achievement of certain goals, targets, and commitments that form part of our Sustainability Action Plan. The Audit Committee provides oversight of GFL's financial risk management, including financial risks related to climate change. The Audit Committee also provides oversight of GFL's enterprise risk management process to ensure the identification and management of the key business risks and opportunities that could potentially have significant financial or social impacts on our business, including those that are climate-related. GFL's Risk Management Steering Committee, which oversees the implementation and management of our enterprise risk management process, reports to the Audit Committee.
[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:
☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply
☑ Consulting regularly with an internal, permanent, subject-expert working group
☑ Engaging regularly with external stakeholders and experts on environmental issues
☑ Integrating knowledge of environmental issues into board nominating process

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

☑ Executive-level experience in a role focused on environmental issues

☑ Management-level experience in a role focused on environmental issues

☑ Experience in the environmental department of a government (national or local)

☑ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Conducting environmental scenario analysis

☑ Implementing the business strategy related to environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ Quarterly

(4.3.1.6) Please explain

GFL's Founder and Chief Executive Officer (CEO) is ultimately responsible for our approach to sustainability and the implementation of our Sustainability Action Plan as part of our climate strategy. The CEO fulfills this management responsibility with support from GFL's executive management team and select committees. GFL executive management team members that are primarily involved in the management of sustainability-related issues are the: Chief Financial Officer (CFO), Chief Legal Officer (CLO), Chief Operating Officer (COO), Executive Vice President Strategic Initiatives (EVP SI), and Chief Human Resources Officer (CHRO). Relevant to this question, the key responsibilities of the CEO's executive team that support the CEO in fulfilling their management responsibilities are as follows: managing public policy engagement, directing the assessment of climate-related dependencies, impacts, risks and opportunities implementing GFL's business and climate strategy, identifying and managing the completion of M&A and divestitures, managing the integration of completed acquisitions, managing major capital and/or operational expenditures to ensure their alignment with our business/climate strategies, setting corporate environmental targets and measuring their progress and providing employee incentives related to environmental performance. To enhance oversight and management of key climate-related risks and opportunities, the executive management team also uses two executive-led committees to ensure that senior managers are engaged and informed. These committees are the Risk Management Steering Committee (RMSC) and the Sustainability Initiatives Committee (SUSIC). The RMSC is responsible for defining risk tolerance/appetite while the SUSIC is responsible for reviewing progress, annually assessing targets and need to implement new targets/refine existing targets. They also identify opportunities to enhance risk management and embed sustainability into the organization.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:
☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

20

(4.5.3) Please explain

As part of our commitment to our sustainability performance, 20% of the incentive compensation for our five named executive officers is tied to the achievement of non-financial metrics which includes achieving certain goals, targets, and commitments set out in our Sustainability Action Plan within the time frames set out in the Plan. Each year, the NGC Committee reviews GFL's non-financial achievements during the fiscal year which, in Fiscal 2024, included climate-related achievements in support of our sustainability goals such as: increased volumes of recycled materials at our facilities, updating our scope 1 and 2 GHG emissions target, achieving our goal related to the purchase of CNG fueled solid waste collection vehicles and the purchase of renewable energy certificates to offset 50% of our scope 2 GHG emissions. For more information on 2024 non-financial achievements, please see GFL's 2025 Management Information Circular.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Corporate executive team

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

Strategy and financial planning

☑ Increased proportion of revenue from low environmental impact products or services

Emission reduction

☑ Implementation of an emissions reduction initiative

☑ Increased share of renewable energy in total energy consumption
☑ Reduction in absolute emissions

Resource use and efficiency
☑ Improvements in emissions data, reporting, and third-party verification

(4.5.1.4) Incentive plan the incentives are linked to

Select from:
☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

As part of our commitment to our sustainability performance, 20% of the incentive compensation for our five named executive officers is tied to the achievement of non-financial metrics which includes achieving certain goals, targets, and commitments set out in our Sustainability Action Plan within the time frames set out in the Plan.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Each year, the NGC Committee reviews GFL's non-financial achievements during the fiscal year which, in Fiscal 2024, included climate-related achievements in support of our sustainability goals such as: increased volumes of recycled materials at our facilities, updating our scope 1 and 2 GHG emissions target, achieving our goal related to the purchase of CNG fueled solid waste collection vehicles and the purchase of renewable energy certificates to offset 50% of our scope 2 GHG emissions. For more information on 2024 non-financial achievements, please see GFL's 2025 Management Information Circular.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(4.6.1.4) Explain the coverage

Our policy applies to all of GFL's direct operations but includes commitments to working with our upstream and downstream partners to maintain environmental protection and progress the transition to a circular economy.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

☑ Other environmental commitment, please specify: Providing staff with necessary resources to minimize environmental impacts, improving our EMS, embedding environmental management into our culture.

Climate-specific commitments

☑ Commitment to 100% renewable energy

☑ Other climate-related commitment, please specify: Monitoring and reporting on our performance internally and externally and holding ourselves accountable to meeting our goals and commitments.

Social commitments

☑ Adoption of the UN International Labour Organization principles

Additional references/Descriptions

☑ Description of environmental requirements for procurement

☑ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

☑ Description of membership and financial support provided to organizations that seek to influence public policy

☑ Reference to timebound environmental milestones and targets

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ No, but we plan to align in the next two years

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

GFL-Corporate-Env-Policy-2025.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ Task Force on Climate-related Financial Disclosures (TCFD)

(4.10.3) Describe your organization's role within each framework or initiative

In 2022, we disclosed (in our 2021 Sustainability Report) our intent to publish a standalone report of our climate-related disclosures in line with the recommendations of the TCFD by 2024. We fulfilled this commitment publishing our first Climate Report aligned with the TCFD recommendations in 2024 - our 2023 Climate Report which can be found here: https://investors.gflenv.com/English/esg/sustainability/default.aspx. We intend to update our climate report annually.
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ No, and we do not plan to have one in the next two years

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ No

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

GFL's Sustainability Initiatives Committee (SUSIC) is responsible for reviewing progress against our Sustainability Action Plan, annually assessing targets and the need to implement new targets and/or refine existing targets. Positions on environmental policy or regulations that are to be directly communicated to the governing body or agency are reviewed by the SUSIC to ensure they are consistent with GFL's environmental commitments.
[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☑ Other trade association in North America, please specify :National Waste & Recycling Association (NWRA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The National Waste & Recycling Association (NWRA) is the leading voice of the North American waste and recycling industry on advocacy, education and safety. NWRA plays an active leadership role in advancing policies that benefit the solid waste industry and improve the quality of life for all Americans. NWRA supports the Environmental Protection Agency's (EPA) efforts to advance a National Recycling Strategy and urges Congress and federal regulatory agencies to implement policies that reduce contamination in the recycling stream, increase processing efficiency, encourage development of the domestic market for recycled materials and focus on actions with the greatest overall environmental benefits. GFL actively participates in the committees of the NWRA as well as providing representation (when selected

through Association nomination processes) on the Board of Trustees and Services Board of Governors. We provide our knowledge and expertise on a number of waste management areas like recycling, resource recovery, landfill gas management and GHG emissions accounting.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

$147,721

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Corporate membership fees and funding related to various legislative issues which allows GFL to participate in association related activities and provide our experience and position on climate-related issues.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☑ Other trade association in North America, please specify :Renewable Natural Gas (RNG) Coalition

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The RNG Coalition is a non-profit organization dedicated to the sustainable advancement of renewable natural gas (RNG) as a clean, green, alternative and domestic energy resource - and as a key component and partial solution to addressing global climate change. The RNG Coalition was formed to provide an education platform and advocacy voice for the protection, preservation and promotion of renewable natural gas. GFL's membership in this coalition is to support the advocacy and participate in the educational aspects of the organization.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

$45,876

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Corporate membership fee which allows GFL to participate in association related activities and provide our experience and position on climate-related issues.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 6

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America
☑ Other trade association in North America, please specify: Canadian Biogas Association

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The Canadian Biogas Association (CBA) is dedicated to building a strong and robust biogas and renewable natural gas (RNG) industry across Canada. It serves as the collective voice of the industry, advocating for supportive policies, educating stakeholders, and connecting members to foster knowledge transfer and collaboration. GFL participates as a member to assist the CBA in furthering these objectives which also help to advance GFL's progress on meeting its sustainability goals related to increasing the beneficial use of biogas from landfills and the increased use of RNG within its fleet.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

$6,356

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Corporate membership fee which allows GFL to participate in association related activities and provide our experience and position on climate-related issues.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement
[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:
☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:
☑ In mainstream reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply
☑ Climate change

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Governance

☑ Dependencies & Impacts

☑ Risks & Opportunities

(4.12.1.6) Page/section reference

See sections Risk Factors and Corporate Structure

(4.12.1.7) Attach the relevant publication

Annual-Report.pdf

(4.12.1.8) Comment

GFL's 2024 Annual Report is publicly available on our website here: https://s24.q4cdn.com/409248530/files/doc_financials/2024/ar/Annual-Report.pdf

Row 2

(4.12.1.1) Publication

Select from:

☑ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Underway - previous year attached

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Dependencies & Impacts

☑ Content of environmental policies

(4.12.1.6) Page/section reference

Pages 4-17, 25-29

(4.12.1.7) Attach the relevant publication

GFL2023SustainabilityReport.pdf

(4.12.1.8) Comment

Pages 4-17 provide information on our strategy, governance, operations, sustainability goals, information on our emissions and services. Pages 25-29 provide additional operational information as well as on biodiversity. GFL's most recent Sustainability Report is available here: https://s24.q4cdn.com/409248530/files/Sustainability/GFL2023SustainabilityReport.pdf

Row 3

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

(4.12.1.4) Status of the publication

Select from:

☑ Underway - previous year attached

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Dependencies & Impacts

☑ Public policy engagement

☑ Other, please specify: Risk Management, Climate Scenarios

(4.12.1.6) Page/section reference

Strategy: pg. 4, Governance: pgs. 5-7, Risks, Opportunities, Dependances, Impacts: pgs. 8-14, Risk Management: pgs. 15-16, Metrics/Targets: pgs. 17-20, Climate Scenarios: Appendix A, Emissions: Appendix B

(4.12.1.7) Attach the relevant publication

GFL2023ClimateReport-1.pdf

(4.12.1.8) Comment

Our 2023 Climate Report, prepared in alignment with the TCFD recommendations is available here: https://s24.q4cdn.com/409248530/files/Sustainability/GFL2023ClimateReport-1.pdf

Row 4

(4.12.1.1) Publication

Select from:

☑ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Emissions figures

☑ Other, please specify: Various climate, air and water-related metrics

(4.12.1.6) Page/section reference

Pages 1-6

(4.12.1.7) Attach the relevant publication

2024 Data Summary.pdf

(4.12.1.8) Comment

Our 2024 Data Summary is attached

Row 5

(4.12.1.1) Publication

Select from:
☑ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply
☑ Climate change

(4.12.1.4) Status of the publication

Select from:
☑ Complete

(4.12.1.5) Content elements

Select all that apply
☑ Strategy
☑ Emissions figures
☑ Emission targets
☑ Other, please specify: other climate-related initiatives and targets like recycling

(4.12.1.6) Page/section reference

Pages 1-3

(4.12.1.7) Attach the relevant publication

2024_SASB_Table.pdf

(4.12.1.8) Comment

Our 2024 SASB Report is attached
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Annually
[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios
☑ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:
☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

☑ Other finance and insurance driving forces, please specify: Business interruption and property damage.

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used to assess the impacts of tropical cyclones on GFL's operations. As discussed in Section 3, GFL operations in coastal regions along the southeast United States and Canada are particularly at risk from tropical cyclones. Direct hurricane impact on facilities could result in significant repair or replacement costs for high-value assets. Uncertainty exists on future changes of tropical cyclone activities, and therefore, the assessment reviewed average annual revenue losses over a long period of time as well as extreme events (1-100 and 1-1000 year events). Exposure and vulnerability analyses were used to refine a list of potentially impacted sites in the south and southeast U.S. and the east coast of Canada and relied upon historical events, scientific literature, and the Saffir-Simpson Scale Hurricane Wind Scale, among other assessment tools.

(5.1.1.11) Rationale for choice of scenario

RCP4.5 is a 2-degree Celsius aligned scenario. It represents a "middle of the road" or "stabilization" scenario with moderate efforts to reduce emissions, including the implementation of some policies and lower emissions technologies. RCP4.5 aligns well with GFL's current strategy to reduce GHG emissions, as well as the current mix of emissions reduction technologies available and current climate change regulations in the markets in which we operate.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

☑ Other finance and insurance driving forces, please specify: Business interruption and property damage.

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used to assess the impacts of Tropical cyclones on GFL's operations. As discussed in Section 3, GFL operations in coastal regions along the southeast United States and Canada are particularly at risk from tropical cyclones. Direct hurricane impact on facilities could result in significant repair or replacement costs for high-value assets. Uncertainty exists on future changes of tropical cyclone activities, and therefore, the assessment reviewed average annual revenue losses over a long period of time as well as extreme events (1-100 and 1-1000 year events). Exposure and vulnerability analyses were used to refine a list of potentially impacted sites in the south and southeast U.S. and the east coast of Canada and relied upon historical events, scientific literature, and the Saffir-Simpson Scale Hurricane Wind Scale, among other assessment tools.

(5.1.1.11) Rationale for choice of scenario

RCP8.5 is a 4-degree Celsius aligned scenario that represents a "business-as-usual" scenario with high fossil fuel use and minimal efforts to mitigate climate change. It was used to assess risks to GFL under worst-case climate conditions.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP2

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.0ºC - 2.4ºC

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used to assess the impacts of changing precipitation patterns on GFL's landfill operations. Uncertainties include any inherent uncertainties and limitations with the CMIP6 daily precipitation data used for the analysis. Change in precipitation is computed between the modeled historical and projected future values to get a percentage change of seasonal precipitation. A 1:1 increase in precipitation and leachate production was used (e.g., a 5% increase in precipitation leads to a 5% increase in leachate produced). 2023 costs for the processing of leachate were used to estimate additional future costs.

(5.1.1.11) Rationale for choice of scenario

SSP2-4.5 is a 2 degree Celsius aligned scenario. It represents a “middle of the road” or "stabilization" scenario with moderate efforts to reduce emissions including the implementation of some policies and lower emissions technologies. SSP2-4.5 aligns well with GFL’s current strategy to reduce GHG emissions as well as the current mix of emissions reduction technologies available and current climate change regulations in the markets in which we operate.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0ºC and above

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used to assess the impacts of changing precipitation patterns on GFL's landfill operations. Uncertainties include any inherent uncertainties and limitations with the CMIP6 daily precipitation data used for the analysis. Change in precipitation is computed between the modeled historical and projected future values to get a percentage change of seasonal precipitation. A 1:1 increase in precipitation and leachate production was used (e.g., a 5% increase in precipitation leads to a 5% increase in leachate produced). 2023 costs for the processing of leachate were used to estimate additional future costs.

(5.1.1.11) Rationale for choice of scenario

SSP5-8.5 is a 4 degree Celsius aligned scenario that represents a "high impact" scenario with development mainly driven by the use of fossil fuels with minimal efforts to mitigate climate change. It was used to assess risks to GFL under worst-case climate conditions.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Nationally Determined Contributions (NDCs)

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used in assessing potential impacts on GFL's fuel procurement costs due to changes in market and policy conditions arising from the low carbon transition. The NDC scenario assumes that all NDC pledges are met even if they are not implemented yet. Transition risks are relatively low. Global warming is assumed to increase to around +2.5°C. Assumptions were made on the annual growth of GFL's fleet as well as fuel procurement volumes. The decarbonization of GFL's fleet was based on our target of 50% of annual fleet replacements with CNG or alternative fuel vehicles being met and our goal of using more RNG in our CNG vehicles. Scenario-based fuel price data was sourced from the Network for Greening the Financial System (NGFS).

(5.1.1.11) Rationale for choice of scenario

This scenario was used as a low-transition risk scenario. It is representative of a future in which transition risk is lower due to the low ambition of climate policies and otherwise slow changes in market and technology environments.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ NGFS scenarios framework, please specify :Net Zero 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used in assessing potential impacts on GFL's fuel procurement costs due to changes in market and policy conditions arising from the low-carbon transition. The Net Zero 2050 scenario is the most ambitious scenario, which is fully aligned with the Paris Agreement's goal to limit global warming to +1.5°C. It is a high (or higher) transition risk scenario. In addition, it is assumed that there are significant policy incentives for the deployment of renewables and higher carbon taxes inherent in fuel prices. As with the NDC scenario, assumptions were made on the annual growth of GFL's fleet as well as fuel procurement volumes. The decarbonization of GFL's fleet was based on our target of 50% of annual fleet replacements with CNG or alternative fuel vehicles being met and our goal of using more RNG in our CNG vehicles. Scenario-based fuel price data was sourced from the Network for Greening the Financial System (NGFS).

(5.1.1.11) Rationale for choice of scenario

Conversely to the NDCs scenario, this scenario assumes strong climate policies are implemented to significantly reduce global emissions. The Net Zero scenario is representative of a future in which transition risk is high due to the significant market, technological, and policy changes needed to achieve the transition.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA STEPS (previously IEA NPS)

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

In addition to analyzing impacts on fuel procurement costs due to changes in market and policy conditions, GFL assessed changes to fuel costs also due to carbon pricing policy instruments that put a price on carbon to incentivize less carbon-intensive practices. The STEPS scenario is a conservative climate scenario, assuming

that not all announced and scheduled policies will be implemented. Other assumptions included that all carbon costs are passed through by suppliers which aligns with the literature reviews showing that the majority of carbon costs related to transport fuels are passed through to customers. Present and future scenario-based carbon prices from government sources or the International Energy Agency (IEA) were used. Assumptions were made on the annual growth of GFL's fleet and the growth (or decrease) in fleet-related GHG emissions and fuel procurement volumes. RNG and electric vehicles were assumed to have zero emissions. The decarbonization of GFL's fleet was based on our target of 50% of annual fleet replacements with CNG or alternative fuel vehicles being met and our goal of using more RNG in our CNG vehicles.

(5.1.1.11) Rationale for choice of scenario

The STEPS scenario was used as a best-case (low transition risk) scenario for carbon pricing. The STEPS is representative of a future in which transition risk is relatively low due to fewer market, technological, and policy changes. The STEPS scenario represents the best-case scenario in terms of carbon pricing since it is assumed that the price of carbon does not need to increase as significantly as it does under a Net Zero scenario.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2022

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2050

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Level of action (from local to global)

☑ Global targets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

In addition to analyzing impacts on fuel procurement costs due to changes in market and policy conditions, GFL assessed changes to fuel costs also due to carbon pricing policy instruments that put a price on carbon to incentivize less carbon-intensive practices. The Net Zero Emissions (NZE) scenario is fully aligned with the Paris Agreement's goal to limit global warming to +1.5°C. Present and future carbon prices from government sources or the International Energy Agency (IEA) were used. Assumptions were made on the annual growth of GFL's fleet and the growth (or decrease) in fleet-related GHG emissions and fuel procurement volumes. RNG and electric vehicles were assumed to have zero emissions. The decarbonization of GFL's fleet was based on our target of 50% of annual fleet replacements with CNG or alternative fuel vehicles being met and our goal of using more RNG in our CNG vehicles.

(5.1.1.11) Rationale for choice of scenario

Similar to the NGFS Net Zero 2050 scenario, the NZE scenario is representative of a future in which transition risk is highest due to the significant market, technological, and policy changes needed to achieve the transition. The NZE scenario consequently represents the 'worst-case' scenario in terms of carbon pricing since it is assumed that the price of carbon increases to incentivize further emissions reductions.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0ºC and above

(5.1.1.7) Reference year

2021

(5.1.1.8) Timeframes covered

Select all that apply
☑ 2030
☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

This scenario was used to assess the impacts of changing precipitation patterns on GFL's landfill operations. Uncertainties include any inherent uncertainties and limitations with the CMIP6 daily precipitation data used for the analysis. Change in precipitation is computed between the modelled historical and projected future values to get a percentage change of seasonal precipitation. A 1:1 increase in precipitation and leachate production was used (e.g., a 5% increase in precipitation leads to a 5% increase in leachate produced). 2023 costs for the processing of leachate were used to estimate additional future costs.

(5.1.1.11) Rationale for choice of scenario

SSP5-8.5 is a 4 degree Celsius aligned scenario that represents a "high impact" scenario with development mainly driven by the use of fossil fuels with minimal efforts to mitigate climate change. It was used to assess risks to GFL under worst-case climate conditions.
[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning

☑ Resilience of business model and strategy

☑ Capacity building

☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

We face a variety of acute physical climate hazards to our operations and capital investments, as well as environmental, health and safety risks to our employees, customers, and the communities in which we operate. Our analyses indicate that, relative to current climate conditions, there is a low likelihood of a change in the risk level to our business from acute physical hazards. The collection, recycling and disposal services provided by GFL are essential to assisting our customers and communities in recovering from the impacts of severe weather events. For example, in 2024, our solid waste operations were critical services to support the cleanup and recovery efforts following Hurricane Beryl, which affected large parts of the southern United States. Chronic physical hazards like heat stress on our employees from operating in hotter temperatures, heavy rainfall, sea level rise, and water stress may pose a risk to the effectiveness of our operating procedures. Our operations are currently most exposed to heat stress, given that most of our collection operations occur outdoors or in areas with limited climate control options. To respond to these risks, we have developed policies and procedures for employees and managers to mitigate the risks of heat (and cold) stress during periods of extreme temperatures. We continue to evaluate how chronic hazards may impact the performance of our facilities and the health and safety of our employees and adopt or adapt appropriate policies and procedures to mitigate the impacts of new and changing hazards. We have also started and plan to continue to conduct scenario analysis on our key operations that are vulnerable to chronic physical risks to estimate any incremental capital and operating cost impact to our various lines of business. A transition to a low-carbon economy may have a significant impact on current supply/demand mechanisms for many commodities, favouring a circular economy model and boosting the demand for recycled materials. Our operations are, and will continue to be, affected by changes in recycled commodity prices, including those reflecting market demand for certain recyclable materials and the quality required of those materials. To reduce our exposure to commodity price risk with respect to recycled materials, we have adopted a pricing strategy of charging collection and processing fees for recycling volume collected from third parties where possible. Government entities in jurisdictions in Canada and the United States in which we operate may also implement requirements to divert certain waste materials that are currently accepted at landfills, such as through the implementation of organics bans to encourage composting of food and yard waste, and recyclables bans to encourage diversion of otherwise recyclable materials such as wood waste from landfill disposal. GFL's recycling and organics collection and

processing networks and existing relationships position us well to be awarded contracts to build and operate the infrastructure needed to facilitate this greater circularity. An example of our ability to adapt to such a risk is the role we are playing in Canada in the implementation of recently enacted Extended Producer Responsibility (EPR) legislation. Waste management and materials handling technologies are continuously evolving and may impact the demand for our services and our ability to deliver them. This, in turn, may impact our ability to address our climate-related impacts and support a low-carbon transition. The inability to adopt or implement materials handling technologies at the right time and scale may create competitive disadvantages in those markets that are demanding services to be low carbon and circular. Our dependence on technology in our operations could also, if any of our key technology fails or is unavailable, negatively impact our business. Similarly, we are increasingly reliant on information management systems to support our business decisions, improve efficiency and services to our customers and manage our workforce. Failure or interruption of these systems could also disrupt and negatively impact our business. In response to these potential risks, among other strategies, we developed our award-winning Environmental Innovation Program (EIP). The EIP takes employee-identified technologies, evaluates their potential impact on our business, and plans their integration to help us achieve our circular economy and climate leadership goals, targets, and commitments.
[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:
☑ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:
☑ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:
☑ No, and we do not plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Our customers rely on GFL's operations to safely and reliably collect and dispose of waste streams generated in their homes, businesses, and commercial and institutional settings. GFL uses diesel-powered vehicles in its collection and disposal operations, as there are not currently economically viable options to replace such vehicles, particularly in more remote locations that lack, for example, CNG or electric fueling capacity. We are actively investing in lower-emission alternatives like renewable natural gas for our collection vehicles and exploring other low-carbon technologies. As part of our Sustainability Action Plan, we have committed that at least 50% of our annual solid waste fleet replacements will be with CNG-fueled or other alternative fuel vehicles, and that 85 percent of our US-based CNG fleet will be powered by renewable natural gas by 2030. This staged approach lets us steadily increase non-fossil fuel capacity as each diesel unit reaches end of life, while ensuring we maintain safe, reliable service for our customers. Until the availability, infrastructure, and economics of zero-emission solutions match our operational scale, diesel-powered vehicles will continue to play a role in delivering our essential services to our customers.

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ We have a different feedback mechanism in place

(5.2.8) Description of feedback mechanism

GFL's Investor Relations Team, with support from the Sustainability team, regularly engages with shareholders on sustainability-related issues, including the information in our recent Climate Report. These teams also regularly engage with shareholder groups, through collaborate investor networks like Climate Engagement Canada (CEC). The CEC is a "finance-led initiative aimed at promoting a just transition to a net-zero economy by fostering dialogue between the financial community and Canadian corporations on climate change risks and opportunities." GFL also hosts Investor Days (most recently in February 2025) where our sustainability efforts are highlighted and discussed.

(5.2.9) Frequency of feedback collection

Select from:

☑ Annually

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

The starting points for the assessment of each of the key risks and opportunities in our transition plan were as follows: -The analysis of risks due to extreme weather events focused on our facilities along the east coast of Canada and the United States due to the potential impacts from tropical cyclones. -The analysis of risks due to increased seasonal precipitation focused on potential impacts from increased leachate production at our landfills. -The analysis of risks due to increases in fuel costs focused on policy-related impacts on market prices, including a price on carbon. -The analysis of climate-related opportunities focused on growth in recycling services and producing RNG at our landfills.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

GFL recognizes that building and maintaining climate resilience in our business is an ongoing and evolving effort. For that reason, we continue to update our climate scenario analysis as necessary and be transparent on our efforts through continued disclosure and periodic updates to our annual Climate Report. Our 2024 Climate Report updates information we provided in our 2023 Climate Report (released in 2024), which was prepared in alignment with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD). It also provides an update on our greenhouse gas (GHG) emissions reduction target, including the results of an independent third-party review conducted to confirm that our target, established in our 2023 Climate Report, is aligned with a 1.5°C pathway. Our GHG emissions reduction target is a 30% absolute reduction in total scope 1 and 2 GHG emissions by 2030 from a 2021 base year. The approach we used to identify our target is derived from the separate science-aligned pathways for the different types of emissions that are generated in our operations. The corresponding pillars of our target are: - A reduction in landfill methane emissions at a level aligned with the Global Methane Assessment. - A reduction in fleet emissions at a level aligned with the Science Based Targets initiative's absolute contraction approach for Transport. - 100% renewable electricity at our own facilities, aligned with the International Energy Agency's (IEA) NetZero Roadmap. To ensure our GHG reduction targets are robust and aligned with climate science, GFL engaged a globally recognized sustainability advisory firm to conduct an independent review of the targets and methodology outlined in our first Climate Report. This review evaluated the scientific basis and ambition of our targets against the methodologies referenced in Section 6.2 below, including the Global Methane Assessment, the Science Based Targets initiative, and the International Energy Agency's Net Zero by 2050 scenario. The third party concluded that GFL's targets and target-setting approach are consistent with the above science-aligned pathways limiting global warming to 1.5°C. The review also concluded that GFL's decarbonization efforts are credible and aligned with a science-based 1.5°C pathway.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

GFL2023ClimateReport-1.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☑ No other environmental issue considered

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services
☑ Upstream/downstream value chain
☑ Investment in R&D
☑ Operations
[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply
☑ Risks
☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply
☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

In the transition to a low-carbon economy, there will be increasing demand for products and fuels that have a lower overall carbon footprint. We provide our customers with waste diversion and reuse services and products like recycling, material recovery, composting, and landfill gas capture and utilization, which directly support the transition from a 'take-make-waste' extractive economy to a more circular one. Not only do these services allow us to be a meaningful participant in the circular economy by providing recyclable raw materials that reduce our customers' need for virgin materials, they also help our customers reduce their GHG emissions. The impact on our business from investments in recycling and facilities that convert landfill gas to energy will generate incremental revenue, EBITDA and free cash flow. Our strategy related to realizing opportunities in recycling and producing renewable energy is reflected in our recycling services and beneficial use of biogas targets in our Sustainability Action Plan.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

We deal with hundreds of suppliers that we rely on for our business. We place emphasis on sourcing products and services from local suppliers close to our sites, which helps to maintain efficient operations and supports the local economy. As such, information collected as part of our assessment of physical risks from severe weather events for our operations may also be relevant to our supply chain. Through our Supplier Code of Conduct, we require that all of our suppliers are committed to ensuring environmental compliance, reducing consumption of scarce resources, and managing waste streams in an environmentally responsible manner. As part of our sustainability Action Plan, we have committed to completing sustainability supply chain management audits for 100 of our critical tier 1 suppliers by 2025 to ensure our continued alignment, which may include further assessment of our suppliers against climate-related matters.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate related risks and opportunities continue to influence our investment in R&D. As previously described, we created GFL Renewables to accelerate the development of landfill gas to energy (renewable RNG and electricity) and other renewable energy projects such as wind and solar at some of our landfills given the

ongoing transition to a low carbon economy, increasing demand for fuels which have a lower overall carbon footprint and growing interest by our customer base for waste management service providers that have lower carbon operations and services. These factors contributed to GFL establishing goals to double the beneficial use of biogas from our landfills which will be achieved through the development of new RNG projects at our landfills, having 50% of our annual solid waste fleet replacements be CNG or alternative fuel vehicles and having 85% of our CNG fleet in the U.S. to be powered by RNG by 2030. The goals will help us realize our goal to lower our scope 1 and 2 emissions by 30% by 2030, and will help displace virgin fuels used in transportation vehicles, including our own fleet, and in other industrial uses, thereby mitigating our risks from certain carbon-related regulations. Our award-winning Environmental Innovation Program (EIP) supports our investment in R&D to address climate-related risks and opportunities. Our EIP takes employee-identified technologies and systems, evaluates their potential impact on our business, and plans their integration to help us achieve our circular economy and climate leadership goals. Unique to our program is its focus on supporting and exploring the innovative ideas of GFL's employees, whose local market-based knowledge and experience are essential to address our customers' growing demand for sustainable solutions aligned with the circular economy.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

As disclosed in section 3, our solid waste and environmental services operations can be adversely affected by inclement or severe weather, which could cause delays in our ability to collect, process, and dispose of waste materials, reduce the volume of waste delivered to our disposal sites, delay construction activities at our facilities, or cause us to incur incremental labour, maintenance, and equipment costs and penalties, some or all of which we may not be able to recover from our customers. Risks and opportunities related to severe weather events are included in our capital planning, Environmental Management Systems, and our Safe for Life program, as well as our business impact analysis, budget reviews, and quarterly operating reviews. GFL also reviews physical risks as part of annual capital planning, where risks to assets are identified, prioritized, and budgets allocated to address both risks and opportunities. Quarterly operating reviews report on the effectiveness of the risk mitigating efforts, including near-misses, losses, and lessons learned from severe weather events. Severe weather is monitored, and regional business leaders convene to plan for an upcoming event, including putting clean-up equipment and backup generators on standby for quick mobilization. Our environmental and health and safety management systems require the development of and training on emergency response plans, including hurricane response plans for specific facilities in at-risk regions. We continue to provide our operations with the tools and necessary resources to realize our goals to double our beneficial use of biogas and reduce landfill methane emissions by 30% by 2030. Included in our strategy was the formation of our Landfill Gas Working Group, which includes a cross-section

of employees from our sustainability, landfill management, RNG development, health and safety, and environmental compliance teams that work together to implement best practices to help us achieve our goals.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply
☑ Revenues
☑ Direct costs
☑ Capital expenditures
☑ Capital allocation

(5.3.2.2) Effect type

Select all that apply
☑ Risks
☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply
☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Our resource-related planning may change due to investments and strategies we put in place to respond to environmental risks and/or opportunities, and as we work to meet our sustainability goals. The following case studies relate to GFL's capital allocation: 1) In response to the regulatory risk of carbon pricing mechanisms, we implement surcharge pricing strategies across our business to recover fuel and other environmental compliance costs, allowing us to manage our fuel costs in areas with existing or anticipated carbon tax systems. However, if there is a significant increase in the price of fuel that we are unable to pass along to our customers

through our surcharge pricing strategies, this could increase our operating costs and reduce our operating margins. GFL's analysis indicates that using lower carbon fuels will help mitigate compliance costs in jurisdictions that apply a carbon tax on fuels used in the transportation sector. Implementing our fleet-related goals outlined in our Sustainability Action Plan is therefore an important response to this risk. To meet these fleet-related goals, we expect to incur capital costs to replace diesel vehicles and retrofit maintenance shops to support the operation of CNG vehicles. 2) Circular-economy related opportunities include growth in recycling services and the production of clean fuel (RNG) from landfill gas. GFL anticipates that in the transition to a low-carbon economy, there will be increasing demand for products and fuels that have a lower overall carbon footprint and has allocated capital to incremental growth investments related to RNG projects and investments in material recovery facilities. The risk and opportunity outlined above most impact GFL's short- and medium-term financial planning. GFL estimates a positive ROI from these capital investments.
[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition
	Select from: ☑ Yes	*Select all that apply* ☑ Other methodology or framework

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:
☑ Other, please specify: aligned with recycling and RNG goals in our Sustainability Action Plan

(5.4.1.5) Financial metric

Select from:

☑ CAPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

$298,300,000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

25

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

46

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

0

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization's climate transition

GFL is not required to report its revenue and capital expenditures within the scope of a sustainability taxonomy. However, our recycling and landfill gas to renewable energy projects, on an activity-level basis, map to the Material Recovery from non-hazardous waste category as described in the EU Taxonomy. Our incremental growth investment was $298.3 million in 2024 for incremental sustainability-related capital projects, primarily related to recycling and RNG.
[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:

☑ No, and we do not plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

☑ Other, please specify: See explanation opposite.

(5.10.4) Explain why your organization does not price environmental externalities

While we have not established any formal internal pricing of environmental externalities, our detailed analysis of risks included an assessment of the potential impact on our financial results from the implementation (or modification) of carbon pricing in jurisdictions where we operate.
[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Customers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

	Assessment of supplier dependencies and/or impacts on the environment
Climate change	*Select from:* ☑ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Procurement spend

☑ Reputation management

(5.11.2.4) Please explain

Through our Supplier Code of Conduct, we require that all of our suppliers are committed to ensuring environmental compliance, reducing consumption of scarce resources, and managing waste streams in an environmentally responsible manner. As part of our Sustainability Action Plan, we have committed to completing sustainability supply chain management audits for 100 of our critical tier 1 suppliers by 2025 to ensure our continued alignment, which may include further assessment of our suppliers against climate-related matters.

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization’s purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☑ No, and we do not plan to introduce environmental requirements related to this environmental issue within the next two years

(5.11.5.3) Comment

Through our Supplier Code of Conduct, we require that all of our suppliers are committed to ensuring environmental compliance, reducing consumption of scarce resources, and managing waste streams in an environmentally responsible manner. As part of our Sustainability Action Plan, we have committed to completing sustainability supply chain management audits for 100 of our critical tier 1 suppliers by 2025 to ensure our continued alignment, which may include further assessment of our suppliers against climate-related matters.
[Fixed row]

(5.11.7) Provide further details of your organization’s supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ No other supplier engagement
[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 76-99%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

GFL's services help our customers achieve improved circularity in their supply chains and reduce their own GHG emissions. As highlighted by the IPCC's report 'Climate Change 2022, Mitigation of Climate Change' (IPCC AR6 WG III), the Circular Economy concept is an increasingly important climate change mitigation approach that can help deliver human well-being by minimizing waste of energy and resources. GFL's services support the shift away from linear 'make and dispose' models towards recycling, material recovery, composting, and recognition of waste as a resource via landfill gas capture and utilization. Since our inception, we have made significant investments in new technologies and in the innovation of management and operating processes in each of these areas. GHG emissions are reduced through improved circularity by recycling materials thereby reducing primary material production and transport, avoidance of fossil fuel extraction, processing, transport, and combustion with renewable energy, such as RNG or electricity derived from organic materials, and replacing chemical-based fertilizers derived from fossil fuels with organic fertilizers derived from compost and biosolids. We routinely engage with our customers to educate them on how our services improve the circular economy and reduce their own GHG emissions by presenting educational materials related to waste diversion and recycling, providing tours of our material recovery facilities (MRFs), discussing commodity sale opportunities, and conducting waste audits at customer facilities to identify opportunities for increased waste diversion.

(5.11.9.6) Effect of engagement and measures of success

Important metrics we use to determine the success/impact of engagement campaigns include: tracking of the volume of materials recycled as well as the GHG emissions we helped our customers avoid through the products and services we provide to our customers. In 2024, our facilities recovered over 180,000 tonnes of plastics from landfill (in addition to over 1 million tonnes of fibre, 77,000 tonnes of glass, 79,000 tonnes of metal, and 555,000 tonnes of construction materials and wood). In total, our recycling services avoided over 8.2 million tonnes of emissions for our customers.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ Unknown

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We engage with these groups through direct 1-on-1 meetings, investor days, correspondence and investor surveys. We also engage with them through groups like Climate Engagement Canada (CEC). To support these interactions, we have made and continue to make significant strides in increasing the number and availability of our public disclosures.

(5.11.9.6) Effect of engagement and measures of success

One method that we use to measure the success of our interactions and the quality of our disclosures is our performance with various rating agency surveys. For example, we recently obtained a Prime Rating on the ISS' Corporate ESG Survey. We have also demonstrated continual progress on our MSCI rating.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Business partners in projects

(5.11.9.2) Type and details of engagement

Innovation and collaboration

☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 1-25%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

GFL works with partners to collaborate on projects to advance the part of our climate strategy that helps our customers reduce their GHG emissions. As an example, we have partnered with third-party landfill gas to energy developers to help us advance renewable energy projects at our landfills so that we can meet our goals to double the beneficial use of biogas and reduce our landfill methane emissions 30% by 2030.

(5.11.9.6) Effect of engagement and measures of success

To date, our partnerships have resulted in growing the number of operating RNG facilities in our portfolio to four. We are also currently partnering on a number of other RNG projects that are currently in various stages of development.
[Add row]

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

	Environmental initiatives implemented due to CDP Supply Chain member engagement	Primary reason for not implementing environmental initiatives	Explain why your organization has not implemented any environmental initiatives
	Select from: ☑ No, and we do not plan to within the next two years	*Select from:* ☑ Other, please specify: See explanation opposite	*We have not had a formal engagement with our supply chain initiated through CDP.*

[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used	Provide the rationale for the choice of consolidation approach
Climate change	*Select from:* ☑ Operational control	*GFL uses an operational control approach. No equity investments under GFL's control were excluded from our scope 1 and 2 emissions inventory.*

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply

☑ Yes, an acquisition

☑ Yes, a divestment

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Various acquisitions and divestitures were completed between 2021 and the end of the 2024 reporting year.

(7.1.1.3) Details of structural change(s), including completion dates

Between our 2021 base year and 2024, GFL completed the acquisition of more than 100 businesses across our North American footprint in both our Solid Waste and Environmental Services lines of business, none of which were individually material to our financial results. We do not publicly disclose the names of the organizations acquired unless material. In January 2025, we announced that we had entered into a definitive agreement for the sale of our Environmental Services division, which was completed March 2025. Our Environmental Services segment is composed of our liquid waste management and our soil remediation services businesses. Our 2024 and base year (2021) sustainability and GHG emissions metrics, include our Environmental Services division. The impact of the divestment will be reflected in our 2025 reporting.
[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☑ Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

The global warming potential applied to scope 1, 2, and 3 emissions was updated for all reporting years from the IPCC Fourth Assessment Report (AR4) values to IPCC Fifth Assessment Report (AR5) values.
[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☑ Yes

(7.1.3.2) Scope(s) recalculated

Select all that apply

☑ Scope 1

☑ Scope 2, location-based

☑ Scope 2, market-based

☑ Scope 3

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

A base year is a reference point in the past with which current emissions can be compared. GFL's GHG emissions reduction targets use a fixed 2021 base year. When our GHG targets were first announced as part of our Sustainability Action Plan in our 2021 Sustainability Report, 2021 was established as the base year, being the most recent year with emissions data that is reliable and verifiable. In accordance with The GHG Protocol, base year recalculation and reporting will be triggered by significant changes to quantification methodologies, structural changes, or other material impacts. Where the base year recalculation indicates that the material difference of any individual activity or change, or cumulative changes, is equal to or less than 5%, we may not report an update to our base year emissions. As a growth-focused company, significant structural changes, such as mergers, acquisitions, and divestments, could occur on an annual basis. Our GHG emissions reduction target is based on a fixed base year, and after recalculations under the fixed base year approach, emissions sources from an acquired company are included both with their emissions in the base year (when we did not control these sources yet) and in the current reporting year. Similarly, emissions from divested facilities are excluded with their emissions both in the base year (when they were still controlled by GFL) and the reporting year in which the divestiture occurred. The "all-year" option for recalculating emissions is used for structural changes. Base year emissions are recalculated for the entire year, rather than only for the remainder of the reporting period after the structural change occurred (the pro-rata option). As such, the base year inventory includes emissions from all facilities from January to December.

(7.1.3.4) Past years' recalculation

Select from:

☑ Yes

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ ISO 14064-1

☑ The Greenhouse Gas Protocol: Scope 2 Guidance

☑ US EPA Mandatory Greenhouse Gas Reporting Rule

☑ US EPA Emissions & Generation Resource Integrated Database (eGRID)

☑ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

☑ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

☑ US EPA Center for Corporate Climate Leadership: Direct Fugitive Emissions from Refrigeration, Air Conditioning, Fire Suppression, and Industrial Gases

☑ Other, please specify: Protocol for the quantification of greenhouse gas emissions from waste management activities, version 5.0, October 2013, and Landfill Emissions Model (LEM) developed by the Solid Waste Industry for Climate Solutions (SWICS)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

2021 and 2022 scope 2 emissions associated with electricity use were calculated using data from utility bills for representative facilities. Electricity usage (in kWh) was used to determine electricity consumption for larger facilities and intensity-based energy consumption factors for the remaining facilities. In 2022, we improved our data quality for tracking our electricity use through the use of our utility bill information management system, which was implemented across our portfolio through 2024. Market-based emissions from electricity include electricity that GFL has purposefully chosen. It derives emission factors from contractual instruments, which include the purchase of unbundled attribute claims (RECs).
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

(1) Refrigerants used in fleet and facility cooling systems, (2) Fugitive emissions from septage lagoons, (3) Fugitive emissions associated with the storage of biosolids

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

0.1

(7.4.1.10) Explain why this source is excluded

GHG emissions from these sources in our operations are considered de minimis based on calculations completed in previous inventory years. Emissions data for these sources is not included in the 2024 reporting year.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Calculated emissions for these sources in previous reporting years to evaluate the emissions impact of the source on the overall GHG inventory. Annual confirmation is completed to validate that no substantial changes in the reporting year would result in substantial increases in the emissions source or representation of these excluded emissions sources in our scope 1 and 2 GHG inventory.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

4,726,654

(7.5.3) Methodological details

Our GHG emissions calculations are based on company operating data collected from across the business including operations, legal, and accounting records. Emissions factors and methodology sources are selected based on their relevance and representativeness to the activity data. Sources include those from the US EPA, Environment and Climate Change Canada, and SWICS. GFL, along with other public and private owners and operators of landfills, funded the development of the SWICS protocol for modeling landfill methane emissions and associated Landfill Emissions Model (LEM). The model is based on existing U.S. EPA methodologies and peer-reviewed, published research to model fugitive methane emissions from landfills using measured data inputs. The SWICS protocol and LEM is used to quantify emissions associated with fugitive landfill methane emissions reported under our scope 1 emissions inventory. GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO2, CH4, and N2O. No activities have been identified within GFL's boundary that result in material emissions from SF6, HFCs, PFCs, or NF3. Emissions of all GHGs are consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. For consistency with EPA GHG reporting requirements, GFL's 2021 to 2024 GHG inventories use the IPCC AR-5 GWP values. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported. Biogenic CO2 is accounted for separately from scope 1 and 2 emissions.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

30,953

(7.5.3) Methodological details

GFL's base year emissions have been calculated based on The GHG Protocol, ISO 14064, and associated guidance. Scope 2 location-based emissions reflect the average emissions intensity of grids on which energy consumption occurs (using grid-average emission factor data from the EPA eGRID database and Environment Canada's National Inventory Report).

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

30,953

(7.5.3) Methodological details

Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims. GFL did not purchase any energy attribute certificates (RECs) in 2021.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

337,412

(7.5.3) Methodological details

Emissions were calculated by collecting data on the economic value of goods and services purchased in 2021 (spend data) and secondary data from the United States Environmental Protection Agency's (USEPA or EPA) 'Environmentally-extended input output' (EEIO) database, using the GHG Emission Factors for US Industries and Commodities dataset.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

116,277

(7.5.3) Methodological details

Emissions were calculated by collecting data on the economic value of goods and services purchased in 2021 (spend data) and secondary data from the United States Environmental Protection Agency's (USEPA or EPA) 'Environmentally-extended input output' (EEIO) database, using the GHG Emission Factors for US Industries and Commodities dataset.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

106,396

(7.5.3) Methodological details

Emission factors for upstream electricity production in Canada were calculated based on 2021 electricity consumption from utility invoices and the generation mix for each province as published in Canada's National Inventory Report (NIR) and the eGRID database. T&D loss emission factors for GFL's electricity consumption in Canada were calculated as the difference between emissions intensity for electricity consumption and electricity generation as published in the NIR. Emissions for T&D losses associated with electricity consumption in the US were calculated based on grid loss factors as a percentage of total electricity consumed, as published in the eGRID database. Emissions for upstream production of fuels used by GFL were calculated separately for each greenhouse gas emitted in upstream fuel production and were converted to units of CO2e based on global warming potentials (GWP) published in the IPCC's Fifth Assessment Report (AR5). The quantity of fuel consumed was reported by GFL in units of volume (for liquid fuels) or energy (for gaseous fuels). Emission factors for fuels produced in Canada were based on the Government of Alberta's Carbon Offset Emission Factors Handbook, Version 2.0, October 2019. Emission factors for fuels produced in the US were based on the Argonne Labs GREET1_2019 model, Version 1, October 2019.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

276,629

(7.5.3) Methodological details

Emissions were calculated by collecting data on the economic value of goods and services purchased in 2021 (spend data) and secondary data from the United States Environmental Protection Agency's (USEPA or EPA) 'Environmentally-extended input output' (EEIO) database, using the GHG Emission Factors for US Industries and Commodities dataset.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

682

(7.5.3) Methodological details

Emissions were quantified based on the volume of waste trucked or piped to wastewater treatment plants using emission factors from the Ecoinvent Database, v.3.8.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

1,100

(7.5.3) Methodological details

Emissions from business travel were calculated using the spend-based method, the fuel-based and the distance-based method. The spend-based method was used in conjunction with emission factors from the Ecoinvent Database, v.3.8. to calculate emissions from accommodations and taxi, limo, and train travel. The fuel-based method was used for use of rental vehicles. Emissions associated with rental vehicles were calculated based on fuel volumes and emissions factors from the EPA GHG Emission Factors Hub. The distance-based method was used for flights and employee miles driven in personal vehicles that were not between the employee's permanent residence and normal place of work. Emission factors from the EPA GHG emissions factor hub, were used.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

30,663

(7.5.3) Methodological details

Emissions were calculated using the average-data method. Employee counts, working days, and average distance travelled were used to estimate distance and mode of travel. Canadian employee travel distance is based on Statistics Canada datasets and US employee travel distance is based on United States Census Bureau datasets.
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

4,630,217

(7.6.3) Methodological details

Our GHG emissions calculations are based on company operating data collected from across the business including operations, legal, and accounting records. Emissions factors and methodology sources are selected based on their relevance and representativeness to the activity data. Sources include those from the US EPA, Environment and Climate Change Canada, and SWICS. GFL, along with other public and private owners and operators of landfills, funded the development of

the SWICS protocol for modeling landfill methane emissions and associated Landfill Emissions Model (LEM). The model is based on existing U.S. EPA methodologies and peer-reviewed, published research to model fugitive methane emissions from landfills using measured data inputs. The SWICS protocol and LEM is used to quantify emissions associated with fugitive landfill methane emissions reported under our scope 1 emissions inventory. GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO2, CH4, and N2O. No activities have been identified within GFL's boundary that result in material emissions from SF6, HFCs, PFCs, or NF3. Emissions of all GHGs are consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. For consistency with EPA GHG reporting requirements, GFL's 2021 to 2024 GHG inventories use the IPCC AR-5 GWP values. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported in scope 1 emissions. Biogenic CO2 is accounted for separately from scope 1 and 2 emissions.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

4,158,435

(7.6.2) End date

12/31/2023

(7.6.3) Methodological details

Our GHG emissions calculations are based on company operating data collected from across the business including operations, legal, and accounting records. Emissions factors and methodology sources are selected based on their relevance and representativeness to the activity data. Sources include those from the US EPA, Environment and Climate Change Canada, and SWICS. GFL, along with other public and private owners and operators of landfills, funded the development of the SWICS protocol for modeling landfill methane emissions and associated Landfill Emissions Model (LEM). The model is based on existing U.S. EPA methodologies and peer-reviewed, published research to model fugitive methane emissions from landfills using measured data inputs. The SWICS protocol and LEM is used to quantify emissions associated with fugitive landfill methane emissions reported under our scope 1 emissions inventory. GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO2, CH4, and N2O. No activities have been identified within GFL's boundary that result in material emissions from SF6, HFCs, PFCs, or NF3. Emissions of all GHGs are consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. For consistency with EPA GHG reporting requirements, GFL's 2021 to 2024 GHG inventories use the IPCC AR-5 GWP values. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported. Biogenic CO2 is accounted for separately from scope 1 and 2 emissions.

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

4,832,611

(7.6.2) End date

12/31/2022

(7.6.3) Methodological details

Our GHG emissions calculations are based on company operating data collected from across the business including operations, legal, and accounting records. Emissions factors and methodology sources are selected based on their relevance and representativeness to the activity data. Sources include those from the US EPA, Environment and Climate Change Canada, and SWICS. GFL, along with other public and private owners and operators of landfills, funded the development of the SWICS protocol for modeling landfill methane emissions and associated Landfill Emissions Model (LEM). The model is based on existing U.S. EPA methodologies and peer-reviewed, published research to model fugitive methane emissions from landfills using measured data inputs. The SWICS protocol and LEM is used to quantify emissions associated with fugitive landfill methane emissions reported under our scope 1 emissions inventory. GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO2, CH4, and N2O. No activities have been identified within GFL's boundary that result in material emissions from SF6, HFCs, PFCs, or NF3. Emissions of all GHGs are consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. For consistency with EPA GHG reporting requirements, GFL's 2021 to 2024 GHG inventories use the IPCC AR-5 GWP values. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported in scope 1 emissions. Biogenic CO2 is accounted for separately from scope 1 and 2 emissions.

Past year 3

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

4,726,654

(7.6.2) End date

12/31/2021

(7.6.3) Methodological details

Our GHG emissions calculations are based on company operating data collected from across the business including operations, legal, and accounting records. Emissions factors and methodology sources are selected based on their relevance and representativeness to the activity data. Sources include those from the US EPA, Environment and Climate Change Canada, and SWICS. GFL, along with other public and private owners and operators of landfills, funded the development of the SWICS protocol for modeling landfill methane emissions and associated Landfill Emissions Model (LEM). The model is based on existing U.S. EPA methodologies and peer-reviewed, published research to model fugitive methane emissions from landfills using measured data inputs. The SWICS protocol and LEM

is used to quantify emissions associated with fugitive landfill methane emissions reported under our scope 1 emissions inventory. GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO2, CH4, and N2O. No activities have been identified within GFL's boundary that result in material emissions from SF6, HFCs, PFCs, or NF3. Emissions of all GHGs are consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. For consistency with EPA GHG reporting requirements, GFL's 2021 to 2024 GHG inventories use the IPCC AR-5 GWP values. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported in scope 1 emissions. Biogenic CO2 is accounted for separately from scope 1 and 2 emissions. [Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

33,090

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

7,154

(7.7.4) Methodological details

Scope 2 location-based emissions reflect the average emissions intensity of grids on which energy consumption occurs (using grid-average emission factor data from the EPA eGRID database and Environment Canada's National Inventory Report). Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims (RECs). In 2024 GFL purchased 60,000 MWh in RECs, representing 38% of our electricity consumption across North America.

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

34,412

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

14,095

(7.7.3) End date

12/31/2023

(7.7.4) Methodological details

Scope 2 location-based emissions reflect the average emissions intensity of grids on which energy consumption occurs (using grid-average emission factor data from the EPA eGRID database and Environment Canada's National Inventory Report). Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims (RECs).

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

30,796

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

30,796

(7.7.3) End date

12/31/2022

(7.7.4) Methodological details

Scope 2 location-based emissions reflect the average emissions intensity of grids on which energy consumption occurs (using grid-average emission factor data from the EPA eGRID database and Environment Canada's National Inventory Report). Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims. GFL did not purchase any energy attribute certificates (RECs) in 2022.

Past year 3

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

30,953

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

30,953

(7.7.3) End date

12/31/2021

(7.7.4) Methodological details

Scope 2 location-based emissions reflect the average emissions intensity of grids on which energy consumption occurs (using grid-average emission factor data from the EPA eGRID database and Environment Canada's National Inventory Report). Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims. GFL did not purchase any energy attribute certificates (RECs) in 2021.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

129,659

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were calculated by collecting data on the economic value of goods and services purchased in 2024 (spend data) and secondary data from the United States Environmental Protection Agency's (USEPA or EPA) 'Environmentally-extended input output' (EEIO) database, using the GHG Emission Factors for US Industries and Commodities dataset "Supply Chain Greenhouse Gas Emission Factors v1.3 by NAICS-6". IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

108,467

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were calculated by collecting data on the economic value of goods and services purchased in 2024 (spend data) and secondary data from the United States Environmental Protection Agency's (USEPA or EPA) 'Environmentally-extended input output' (EEIO) database, using the GHG Emission Factors for US Industries and Commodities dataset "Supply Chain Greenhouse Gas Emission Factors v1.3 by NAICS-6". IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

120,094

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Extraction, production, and transportation of fuels and energy purchased or acquired by the reporting company in the reporting year, not already accounted for in scope 1 or scope 2, including: purchased fuels, purchased electricity, and electricity transmission and distribution (T&D) losses. Fuel and electricity consumption primary data is sourced from energy providers, including utilities and fuel suppliers. Emissions related to upstream electricity production in Canada were calculated based on the generation mix as published in Canada's National Inventory Report (NIR) and the eGRID database. T&D loss emission factors for GFL's electricity consumption in Canada were calculated as the difference between emissions intensity for electricity consumption and electricity generation, as published in the NIR. Emissions for T&D losses associated with electricity consumption in the US were calculated based on grid loss factors as a percentage of total electricity consumed, as published in the eGRID database. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

132,553

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Hybrid method

☑ Spend-based method

☑ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

40

(7.8.5) Please explain

Emissions from contracted truck transportation in the US were calculated using load, trip, and fuel data provided by suppliers. Canadian transportation and distribution emissions were calculated using spend data. Transportation and distribution emissions represent the fuel combustion emissions associated with third-party transportation. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1,347

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

27

(7.8.5) Please explain

Emissions from the disposal and treatment of office-related waste were estimated using annual waste audit data. Emissions associated with wastewater treatment, for the management of leachate, are based on measured leachate volumes. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Business travel

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3,558

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Spend-based method
☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

21

(7.8.5) Please explain

Business travel includes accommodation, ground transport, and air transport associated with business travel by GFL employees in the reporting year. The spend-based method was used in conjunction with emission factors from the Ecoinvent Database, v.3.8. to calculate emissions from accommodations and taxi, limo, and train travel. The fuel-based method was used for use of rental vehicles. Emissions associated with rental vehicles were calculated based on fuel volumes and emissions factors from the EPA GHG Emission Factors Hub. The distance-based method was used for flights and employee miles driven in personal vehicles that were not between the employee's permanent residence and normal place of work. Emission factors from the EPA GHG emissions factor hub, were used. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

32,268

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Transportation of employees between their homes and their worksites during the reporting year (in vehicles not owned or operated by GFL. Emissions were calculated using the average-data method. Employee counts, working days, and average distance travelled were used to estimate distance and mode of travel. Canadian employee travel distance is based on Statistics Canada datasets and US employee travel distance is based on United States Census Bureau datasets. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Using the operational control approach, leased assets are included in GFL's operational emissions.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Third-party transportation and distribution activities are accounted for in category 4, upstream transportation and distribution. GFL continues to improve methods to estimate the impact of emissions associated with its downstream transportation and distribution activities.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Sold products do not require further processing (UMO to burners). Emissions downstream of GFL's recycling operations associated with processing recovered materials are not reported in GFL's scope 3 GHG inventory.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

32,789

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Other, please specify: Direct use-phase emissions

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

(7.8.5) Please explain

Direct use emissions of sold products. Emissions were calculated using outbound volumes of industrial fuels sold to energy markets provided by GFL's refineries and fuel combustion emission factors from the US EPA. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Emissions from the end-of-life treatment of GFL's sold products were estimated using the outbound volumes of UMO that the Environmental Services line of business sold for blending into lubricants, into automotive and industrial marketers, and to marketers. While it is possible that these sold products may eventually be combusted as a disposal method, GFL provides collection and recycling services for these products and is assuming that all sold UMO is recycled. Emissions associated with combustion as an end-of-life treatment option are considered not relevant. UMO sold to energy markets as a fuel is included in category 11.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Using the operational control approach, leased assets are included in GFL's operational emissions.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

GFL does not own or operate any franchises.

Investments

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

96,349

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Investment-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

3

(7.8.5) Please explain

GFL has selected the operational control approach; emissions from any asset that GFL controls are included in our scope 1 and 2 emissions, but emissions from any asset GFL wholly or partially owns but does not control (e.g., investments) are excluded from scope 1 and 2 and included in our scope 3 inventory, category 15, Investments. This includes equity investments in subsidiaries, associate companies, and joint ventures (JVs) where partners have joint financial control. Emissions from GFL's equity investments in RNG JVs were calculated using natural gas and electricity consumption data provided by utilities. In 2024, 99% of the emissions associated with investments in subsidiaries and associate companies were calculated using company-reported GHG emissions. IPCC AR-5 GWPs were used. Scope 3 GHG emissions were verified by a third party.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

No other scope 3 emissions sources identified.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

No other scope 3 emissions sources identified.
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

263,086

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

192,546

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

101,504

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

172,089

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

1,213

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

3,324

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

34,204

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

32,645

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Scope 3 emissions associated with the categories Purchased Goods and Services (PG&S) and Capital Goods are calculated using the spend-based method as outlined in The GHG Protocol's Technical Guidance for Calculating Scope 3 Emissions. 2023 PG&S and Capital Goods emissions were recalculated based on the updated EEIO emissions factors. 2024 PG&S and Capital Goods emissions categories decrease from 2023 as a result of improved transparency in procurement data and a decrease in spend. A screening-level assessment of GFL's investment related scope 3 emissions was completed for the 2023 reporting year and included in our GHG inventory for 2024. This category includes companies in which GFL has financial influence but not operational control including RNG joint ventures and Green Infrastructure Partners Inc. Scope 1, 2, and 3 GHG emissions have been recalculated for all reporting years using IPCC AR5 global warming potential values.

Past year 2

(7.8.1.1) End date

12/31/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

251791

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

145,107

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

105,847

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

312,581

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

1,242

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

3,178

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

34,336

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

12,009

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Scope 1, 2, and 3 GHG emissions have been recalculated for all reporting years using IPCC AR5 global warming potential values.

Past year 3

(7.8.1.1) End date

12/31/2021

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

337,412

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

116,277

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

106,396

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

276,629

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

682

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

1,100

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

30,663

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Scope 1, 2, and 3 GHG emissions have been recalculated for all reporting years using IPCC AR5 global warming potential values.
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.1.4) Attach the statement

2024 Verification Statement.pdf

(7.9.1.5) Page/section reference

Total scope 1 emissions verified and reporting period - page 2 "total entity-wide emissions verified, total scope 1 emissions: 4,630,217 tCO2e"..."the reporting period is between 01/01/24 and 31/12/24" Assurance opinion - page 3 "Based on our verification, the GHG statement is, in all material aspects, in accordance with the verification criteria and is free of material misstatements."

(7.9.1.6) Relevant standard

Select from:

☑ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

2024 Verification Statement.pdf

(7.9.2.6) Page/ section reference

Scope 2 emissions verified and reporting period - page 2 "Scope 2 emissions (Location-based): 33,090 tonnes CO2e, Scope 2 emissions (Market-Based): 7,154 tonnes CO2e"..."the reporting period is between 01/01/24 and 31/12/24" Assurance opinion - page 3 "Based on our verification, the GHG statement is, in all material aspects, in accordance with the verification criteria and is free of material misstatements."

(7.9.2.7) Relevant standard

Select from:

☑ ISO14064-3

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☑ Scope 3: Investments
- ☑ Scope 3: Capital goods
- ☑ Scope 3: Business travel
- ☑ Scope 3: Employee commuting
- ☑ Scope 3: Use of sold products
- ☑ Scope 3: Purchased goods and services
- ☑ Scope 3: Waste generated in operations
- ☑ Scope 3: Upstream transportation and distribution
- ☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.3.5) Attach the statement

2024 Verification Statement.pdf

(7.9.3.6) Page/section reference

Scope 3 emissions verified and reporting period - page 2 "Total Scope 3 Emissions: 657,084 tonnes CO2e"..."the reporting period is between 01/01/24 and 31/12/24" Assurance opinion - page 3 "Based on our verification, the GHG statement is, in all material aspects, in accordance with the verification criteria and is free of material misstatements."

(7.9.3.7) Relevant standard

Select from:
☑ ISO14064-3

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Increased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

5620

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

0.13

(7.10.1.4) Please explain calculation

Scope 2 market-based emissions from electricity derive emission factors from contractual instruments, which include the purchase of unbundled attribute claims (RECs). In 2023, GFL purchased 33,900 MWh in RECs, reducing scope 2 emissions by 20,322 tCO2e. In 2024, GFL purchased 60,000 MWh in RECs, reducing scope 2 emissions by 26,238 tCO2e. Increasing the volume of REC purchases in 2024 resulted in an overall decrease in scope 2 emissions of 5,620 tCO2e from 2023 to 2024. Emission reductions associated with a switch from fossil fuels to biofuels (diesel to RNG) are reported under "Other emissions reduction activities".

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

161,625

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

3.87

(7.10.1.4) Please explain calculation

From 2023 to 2024, GFL continued to invest in performance improvements in landfill gas capture and collection systems, reducing fugitive methane emissions. In 2024, our landfill gas captured was over 13.2 million MMBtu, up from 12.3 million MMBtu in 2023. In 2024, we continued to invest in converting our fleet from diesel to renewable natural gas (RNG) and increased the use of RNG in our CNG fleet. In 2024, 72.2% of our US CNG fleet was fueled with RNG, up from 59.8% in 2023.

Divestment

(7.10.1.4) Please explain calculation

The impact of divestments is reported under "Acquisitions".

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

460,553

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

11.04

(7.10.1.4) Please explain calculation

The impact of acquisitions, net of divestitures, on our scope 1 and 2 GHG emissions from 2023 to 2024 was an overall increase. Acquisitions or divestitures made during 2024 are reflected only for the portion of the year that the asset was owned, whereas acquisitions or divestitures made in 2023 are reflected as a full year of ownership (or non-ownership, in the case of a divestiture) in 2024. This treatment contributes to changes in reported emissions year over year and limits comparability between 2023 and 2024. In accordance with the GHG Protocol, we recalculated our 2021 base year emissions in the 2024 reporting year to reflect acquisitions, divestitures, methodology improvements for landfill gas modeling, updates to activity data, and the correction of identified errors. As a result, 2024 emissions are most directly comparable to 2021, as both years reflect a consistent organizational boundary and methodology.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

171,532

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

4.11

(7.10.1.4) Please explain calculation

In the 2024 reporting year, we revised certain assumptions applied in our landfill gas emissions calculations for a subset of sites. These methodological updates were applied consistently to our 2024 emissions inventory and incorporated into the recalculation of our 2021 base year, in line with the GHG Protocol. However, our 2023 reported emissions were not restated to reflect these changes and therefore are not directly comparable.
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ Yes

(7.12.1) Provide the emissions from biogenic carbon relevant to your organization in metric tons CO2.

(7.12.1.1) CO2 emissions from biogenic carbon (metric tons CO2)

1,694,903

(7.12.1.2) Comment

Biogenic CO2 emissions result from fuel combustion, including the combustion of landfill gas and renewable diesel, and from waste degradation. Biofuels are used in GFL's fleet, including ethanol blended into gasoline, biodiesel blends, and renewable natural gas. Non-CO2 emissions from biofuel are reported as scope 1 emissions. Biogenic CO2 from the combustion of biofuels in GFL's fleet is accounted for separately from scope 1 and 2 emissions. Landfill gas consists primarily of biogenic carbon dioxide and methane. Fugitive landfill gas emissions and the combustion of landfill gas (biogas) in landfill gas management systems (such as flares and landfill gas utilization facilities) result in biogenic CO2 emissions. Non-anthropogenic methane in landfill gas is included in scope 1 emissions reporting.
[Fixed row]

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

3,876,251

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

15,866

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

738,101

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Fifth Assessment Report (AR5 – 100 year)
[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Canada	*661971*	*9523*	*3191*
United States of America	*3968246*	*23567*	*3963*

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☑ By activity

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Landfill emissions (fugitive methane and LFG combustion)*	*3866533*
Row 2	*Fossil fuel combustion (mobile sources)*	*690910*
Row 3	*Stationary fuel combustion (facility energy use)*	*49580*
Row 4	*Organics management fugitive (emissions from composting)*	*23194*

[Add row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☑ By activity

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Facility electricity consumption*	*33090*	*7154*

[Add row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☑ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:
☑ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

358,003

(7.30.1.3) MWh from non-renewable sources

3,100,409

(7.30.1.4) Total (renewable + non-renewable) MWh

3,458,412.00

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

60,000

(7.30.1.3) MWh from non-renewable sources

99,260

(7.30.1.4) Total (renewable + non-renewable) MWh

159,260.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

418,003

(7.30.1.3) MWh from non-renewable sources

3,199,669

(7.30.1.4) Total (renewable + non-renewable) MWh

3,617,672.00
[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
Consumption of fuel for the generation of steam	*Select from:* ☑ Yes
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

No biomass consumed for energy use

Other biomass

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

No biomass consumed for energy use

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

358,003

(7.30.7.3) MWh fuel consumed for self-generation of electricity

92,174

(7.30.7.4) MWh fuel consumed for self-generation of heat

764

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

Compressed Natural Gas (CNG) and biodiesel is used in our fleet vehicles. At many of GFL's CNG fueling stations, CNG from renewable sources (RNG) is nominated to GFL's fleet vehicles. RNG varies in heat content as the composition of gas delivered may vary. We also utilize landfill gas (LFG) for heat in our operations (i.e. burning in on-site boilers).

Coal

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

No coal is consumed for energy use

Oil

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

28

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

28

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

Waste oil is used in boilers for building heat at some facilities

Gas

(7.30.7.1) Heating value

Select from:

☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

598,907

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

206,581

(7.30.7.5) MWh fuel consumed for self-generation of steam

63,207

(7.30.7.8) Comment

Natural Gas (fossil fuel) is used for building heat in our offices and facilities. Compressed natural gas (CNG) is used in our fleet vehicles.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

2,501,475

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.8) Comment

Propane, gasoline, and diesel used primarily in our fleet vehicles (for example, diesel in our solid waste collection trucks or propane in forklifts in our Material Recovery Facilities [MRFs])

Total fuel

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

3,458,413

(7.30.7.3) MWh fuel consumed for self-generation of electricity

92,174

(7.30.7.4) MWh fuel consumed for self-generation of heat

207,372

(7.30.7.5) MWh fuel consumed for self-generation of steam

63,207

(7.30.7.8) Comment

Total fuel
[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

26,756

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

26,756

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Heat

(7.30.9.1) Total Gross generation (MWh)

65

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

65

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

65

Steam

(7.30.9.1) Total Gross generation (MWh)

52,462

(7.30.9.2) Generation that is consumed by the organization (MWh)

52,462

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0
[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☑ United States of America

(7.30.14.2) Sourcing method

Select from:

☑ Unbundled procurement of energy attribute certificates (EACs)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

60,000

(7.30.14.6) Tracking instrument used

Select from:

☑ US-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ United States of America

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2011

(7.30.14.10) Comment

GFL purchased 2024 vintage RECs from three wind projects with commissioning years in 2011, 2016, and 2020.

Row 2

(7.30.14.1) Country/area

Select from:

☑ Canada

(7.30.14.2) Sourcing method

Select from:

☑ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Low-carbon energy mix, please specify :Electricity consumption in provinces with >95% renewable energy sources, excluding nuclear

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

42,986

(7.30.14.6) Tracking instrument used

Select from:

☑ No instrument used

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Canada

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

Renewable energy from provincial grids in Canada in which GFL operates that contain greater than 95% renewable energy (excluding nuclear).
[Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Canada

(7.30.16.1) Consumption of purchased electricity (MWh)

57,152

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

97,551

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

154703.00

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

102,108

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

172,237

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

274,345.00
[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

590

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

4,637,371

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

7,862

(7.45.5) Scope 2 figure used

Select from:
☑ Market-based

(7.45.6) % change from previous year

6.3

(7.45.7) Direction of change

Select from:

☑ Increased

(7.45.8) Reasons for change

Select all that apply

☑ Mergers

☑ Divestment

☑ Acquisitions

☑ Change in output

☑ Change in revenue

☑ Change in methodology

☑ Other emissions reduction activities

☑ Change in renewable energy consumption

(7.45.9) Please explain

Section 7.10 describes the reasons for the net change in scope 1 and 2 emissions from 2023 to 2024. Revenue grew by 4.6% over the same period.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☑ Energy usage

(7.52.2) Metric value

37.7

(7.52.3) Metric numerator

Percentage of Electricity Consumed - Renewable

(7.52.4) Metric denominator (intensity metric only)

not applicable

(7.52.5) % change from previous year

37

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

GFL's ambition is to use 100% renewable electricity at GFL-owned facilities aligned with the International Energy Agency's pathway to Net Zero.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:
☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:
☑ 1.5°C aligned

(7.53.1.5) Date target was set

01/06/2025

(7.53.1.6) Target coverage

Select from:
☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply
☑ Methane (CH4)

(7.53.1.8) Scopes

Select all that apply
☑ Scope 1

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

4,014,284

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

4,014,284.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

85

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

84

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

30

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

2,809,998.800

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

3,866,533

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

3,866,533.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

12.27

(7.53.1.80) Target status in reporting year

Select from:

☑ New

(7.53.1.82) Explain target coverage and identify any exclusions

Target covers all fugitive landfill methane emissions from landfills within our scope 1 GHG emissions reporting boundary using an operational control approach. The target includes methane emissions from landfills and excludes any non-methane emissions such as biogenic CO2.

(7.53.1.83) Target objective

In alignment with the GMP and scenarios consistent with 1.5°C of warming, GFL has adopted a target to reduce methane from our landfills 30% by 2030, from a 2021 base year. This target reflects our commitment to climate action while also positioning us to reduce the future costs of compliance with emerging methane regulations and carbon markets.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

In 2024, we achieved a 4% reduction in our landfill methane emissions from 2021. The largest portion of our scope 1 emissions is from our landfills. As waste degrades over an extended period, it continues to generate increased levels of methane for many years after its placement. We continued to expand and modernize landfill gas capture systems to reduce fugitive emissions and advance circularity. In 2024, we commissioned three new renewable natural gas (RNG) facilities, which will deliver long-term reductions in emissions while supporting renewable fuel production.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

01/06/2025

(7.53.1.6) Target coverage

Select from:

☑ Business activity

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)
☑ Methane (CH4)
☑ Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply
☑ Scope 1

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

654501

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

654,501.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

14

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

14

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

42

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

379,610.580

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

690,910

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

690910.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

-13.24

(7.53.1.80) Target status in reporting year

Select from:

☑ New

(7.53.1.82) Explain target coverage and identify any exclusions

GFL has set a target to reduce fleet-related emissions by 42% by 2030 from a 2021 base year. This target is aligned with the SBTi absolute contraction approach for companies operating fleet vehicles. Biogenic CO2 from the combustion of biofuels (such as RNG) is excluded from this target. This target includes fuel consumption for our solid waste collection fleet vehicles.

(7.53.1.83) Target objective

Our fleet target not only contributes to decarbonization goals but also helps GFL mitigate fuel cost volatility, prepare for evolving regulatory requirements, and position our operations for long-term resilience in a low-carbon economy.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

While total fleet emissions have increased since 2021 due to business growth, our CNG and RNG strategy has significantly curbed the impact. In 2024, we met our goal of ensuring at least 50% of our annual solid waste collection fleet replacements were CNG or other alternative-fuel vehicles, and 72% of our U.S. CNG fleet was fueled with RNG. This reflects our commitment to displacing diesel with lower- and zero-emission alternatives. In parallel, we are executing on route optimization to maximize route density and improve asset utilization, further reducing fuel consumption and associated emissions. Without this transition strategy, emissions from our growing fleet would have been materially higher. Continued expansion of our CNG fleet creates further opportunity to scale the use of RNG, positioning us for deeper reductions over time.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 4

(7.53.1.1) Target reference number

Select from:

☑ Abs 4

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, but we are reporting another target that is science-based

(7.53.1.5) Date target was set

01/06/2025

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

4,726,654

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

30,953

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

4,757,607.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

30

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

3,330,324.900

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

4,630,217

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

7,154

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

4,637,371.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

8.42

(7.53.1.80) Target status in reporting year

Select from:

☑ New

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers all scope 1 and 2 emissions, with the exception of biogenic carbon.

(7.53.1.83) Target objective

Our GHG emissions reduction target is a 30% absolute reduction in total scope 1 and 2 GHG emissions by 2030 from a 2021 base year.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

In 2024, we achieved a 3% reduction in our scope 1 and 2 emissions from a 2021 base year. GFL's climate goals focus on reducing our own GHG emissions while prioritizing the important role we play in the transition to a circular and low-carbon economy. We have set ambitious short-term goals that align with our business

strategy and represent the highest and best use of our capital, resulting in sustainable growth for our business as well as meaningful reductions to our customers' and our own GHG emissions.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

☑ Targets to reduce methane emissions

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

09/16/2022

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ Electricity

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2021

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

168,712

(7.54.1.9) % share of low-carbon or renewable energy in base year

0

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

37.7

(7.54.1.13) % of target achieved relative to base year

37.70

(7.54.1.14) Target status in reporting year

Select from:

☑ Underway

(7.54.1.16) Is this target part of an emissions target?

We are addressing emissions associated with electricity use. In the IEA's pathway to net zero, nearly 90% of global electricity generation comes from renewable sources by 2050. Renewable energy technologies such as solar and wind are key to reducing emissions in the electricity sector, currently the largest global source of carbon dioxide emissions. In support of this transition, GFL is committed to sourcing 100% of the electricity used in our operations from renewable sources by 2030.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ Other, please specify: Aligned with the International Energy Agency's pathway to net zero and the goals of the Paris Agreement.

(7.54.1.19) Explain target coverage and identify any exclusions

Our Sustainability Action Plan includes a commitment to 100% use of renewable electricity in operations under our control by 2030. This target covers all operations included in our scope 1 and 2 GHG emissions inventory. Operations outside of the operational control boundary are excluded, consistent with our GHG inventory.

(7.54.1.20) Target objective

This target is to help us achieve our overall objective to reduce our scope 1 and 2 emissions by 30% by 2030. At the same time, locations where we are able to use renewable energy that we produce (e.g. via renewable natural gas from our landfills or solar or wind projects that may be installed at our sites) to power and heat our buildings may also help to lower utility costs.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

As part of our Sustainability Action Plan, we have made a commitment to 100% use of renewable electricity in operations under our control by 2030. To achieve our goal of 100% renewable energy (electricity) at our own facilities, we are using landfill gas for heat and power, installing other forms of renewable energy, and

purchasing electricity from market-based instruments. We have also implemented a utility bill management system to improve the quality of our electricity usage data. In 2024, we purchased Renewable Energy Certificates (RECs) that reduced our scope 2 emissions.
[Add row]

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:
☑ Oth 1

(7.54.2.2) Date target was set

09/16/2022

(7.54.2.3) Target coverage

Select from:
☑ Business activity

(7.54.2.4) Target type: absolute or intensity

Select from:
☑ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Energy consumption or efficiency
☑ million Btu

(7.54.2.7) End date of base year

12/31/2021

(7.54.2.8) Figure or percentage in base year

4,466,712

(7.54.2.9) End date of target

12/31/2030

(7.54.2.10) Figure or percentage at end of date of target

8,933,424

(7.54.2.11) Figure or percentage in reporting year

4,527,067

(7.54.2.12) % of target achieved relative to base year

1.3512176294

(7.54.2.13) Target status in reporting year

Select from:
☑ Underway

(7.54.2.15) Is this target part of an emissions target?

Yes. It will help us achieve our goal of reducing our landfill methane emissions 30% by 2030, from a 2021 base year.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply
☑ Reduce short-lived climate pollutants

(7.54.2.18) Please explain target coverage and identify any exclusions

The target includes all the landfills within our portfolio that are within our operational control, consistent with our GHG inventory.

(7.54.2.19) Target objective

Included in our Sustainability Action Plan is our goal to increase by 2x the beneficial use of biogas (landfill gas) from our landfills by 2030. By capturing more biogas for beneficial use and achieving higher gas capture efficiencies we will reduce fugitive methane emissions. These are key actions required to achieve our goal of reducing our landfill methane emissions 30% by 2030.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

Since 2021, we have been focused on accelerating the development of renewable energy projects with including RNG and electricity production from biogas at our landfills. These projects will increase our capture and reuse of landfill gas and produce renewable energy for commercial and industrial direct-use applications, including RNG to be used as fuel in our own fleet of CNG-powered vehicles. Harnessing landfill gas for energy conversion replaces fossil fuels, such as natural gas, and avoids the environmental impacts associated with its extraction. In 2023, GFL's first RNG facility at the Arbor Hills Landfill came online. As of the end of 2024, we have commissioned four landfill gas to RNG facilities and currently have an additional 15 landfill gas to RNG projects under development or in active negotiation. [Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	*0*	-
To be implemented	*0*	*0*
Implementation commenced	*0*	*0*
Implemented	*3*	*8,309,594*
Not to be implemented	*0*	-

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Waste reduction and material circularity

☑ Waste reduction

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

8,211,465

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 3: Other (upstream)

☑ Scope 3: Other (downstream)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

$439,500,000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

$298,300,000

(7.55.2.7) Payback period

Select from:

☑ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 11-15 years

(7.55.2.9) Comment

Emissions savings are the estimated 2024 avoided emissions associated with GFL's circular-economy related products and services; recycling at our MRFs, composting, and the production of renewable fuel from biogas (RNG). These emissions reductions are calculated using the EPA WARM v15 16 model, by comparing the GHG emissions from a baseline waste management scenario, where all tonnes are landfilled, to an alternative scenario in which the tonnages are recycled. Emissions savings from displacing diesel with RNG vehicles in our fleet are estimated by calculating the volume of RNG used and applying the EPA diesel emission factor to determine the equivalent emissions avoided. Emissions savings from displacing pipeline natural gas (brown gas) with RNG are calculated using lifecycle emission factors associated with natural gas extraction, processing, and combustion, and applying them to the annualized volumes of landfill gas sent to beneficial use from RNG facilities that came online in 2024. Annual savings are represented as revenue from recycling in 2024 which was $439.5 million. $289.3 million of incremental growth investments was deployed in 2024 which consisted of incremental sustainability related capital projects, primarily related to recycling and RNG which in part contributed to this figure.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

At many of our landfill sites, landfill gas collection and control are a regulatory requirement. However, at those sites where we are developing renewable energy projects we are installing enhanced gas capture systems that can perform above regulatory requirements and beneficially use the landfill gas for electricity or renewable natural gas production.

Row 2

(7.55.3.1) Method

Select from:

☑ Employee engagement

(7.55.3.2) Comment

GFL's annual Greenlight Workshop is part of our broader Environmental Innovation Program and is hosted annually. The workshop fosters healthy competition among teams of employees encouraging them to find near-term sustainable solutions to an identified process or operation that can be rolled out across our lines of business or in different markets. This employee engagement activity is intended to reinforce our entrepreneurial and innovative culture and directly involves our employees in the identification and development of new and innovative solutions that are aligned with our overall sustainability goals targets and commitments including those that are climate-related

Row 3

(7.55.3.1) Method

Select from:

☑ Financial optimization calculations

(7.55.3.2) Comment

GFL continues to invest in the conversion of our solid waste collection fleet to CNG and the automation of our residential solid waste collection fleet. In addition to these capital investments in our fleet, continued optimization of GFL's collection routes leads to cost savings on fuel expenditures and reductions in GHG emissions. Fleet conversion is one example of our Sustainable Value Initiatives identified and adopted as part of our Environmental Innovation Program that will drive progress toward achieving the sustainability goals targets, and commitments within our Sustainability Action Plan.

Row 4

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

Since 2021 we have been focused on accelerating the development of renewable energy projects including RNG, renewable electricity, and other renewable energy projects, such as wind and solar, at our landfills. RNG projects will increase our capture and reuse of landfill gas and produce RNG for commercial and industrial direct-use applications, including as fuel in our own fleet of CNG-powered vehicles. Harnessing landfill gas for conversion to RNG replaces fossil fuels, such as natural gas, and avoids the environmental impacts associated with its extraction. We expect these projects to generate significant returns on our investment. These projects will increase our capture and beneficial use of landfill gas (biogas) and produce RNG or electricity. RNG will be used as a direct-use fuel, including as fuel in GFL's fleet of compressed natural gas (CNG) vehicles, and for sale into transportation or other voluntary markets. Capturing more landfill gas will also help us reduce our own GHG emissions. The RNG produced will help displace virgin fuels used in vehicles, including our own fleet, and in other industrial uses, mitigating our risks from certain carbon-related regulations. We expect to identify further opportunities to use carbon pricing incentives to drive capital projects to achieve other emissions reductions and are currently evaluating emission reduction credit opportunities for which we qualify for the services we provide.
[Add row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Climate Bonds Taxonomy

(7.74.1.3) Type of product(s) or service(s)

Other

☑ Other, please specify: Materials recovery and recycling

(7.74.1.4) Description of product(s) or service(s)

Includes the recovery of recyclable materials and recycling of those materials. Material recovery facilities (MRFs) sort recyclables into separate streams of glass metal plastic paper cardboard etc. These recovered materials are then sold to end users to be used in the production of products and packaging instead of virgin materials. GFL also recovers and recycles liquid waste including antifreeze and motor oil. The recycled liquid waste products have a lower carbon footprint than their virgin material equivalents.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☑ Other, please specify: US EPA Waste Reduction Model (WARM)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☑ Cradle-to-grave

(7.74.1.8) Functional unit used

Mass of material tonnes recycled

(7.74.1.9) Reference product/service or baseline scenario used

Production of materials from virgin sources from raw material extraction and processing to market.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☑ Cradle-to-grave

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

2.38

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

In 2024 we collected, transferred, processed and recovered approximately 2 million tonnes of recyclable materials, avoiding an estimated 2.38 tCO2e/tonne of material recycled. A lifecycle approach was followed covering the extraction and processing of virgin materials and transportation to market. End-use emissions are excluded and considered to be equivalent across comparable scenarios avoided emissions are reported for a one-year period. The primary enabling effects of recycled materials are assumed to be the immediate reduction of emissions associated with the extraction and processing of virgin materials. Secondary enabling effects were not included in the calculation of avoided emissions. GFL calculates avoided emissions using the EPA's Waste Reduction Model (WARM), version 16, by comparing the GHG emissions from a baseline waste management scenario, where all 2 million tonnes are landfilled, to an alternative scenario in which the tonnages are recycled. The avoided emissions are the difference between the GHG emissions from the two scenarios. The GHG emission factors used in WARM are based on a life cycle perspective. In the case of GFL's avoided emissions calculations, the methane emissions from materials degrading in a landfill are compared to the emissions avoided from re-manufacturing an equivalent quantity of material using recycled inputs instead of virgin materials to identify annual emissions avoided from recycling.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

5.6
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:
☑ No

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Other, please specify: As part of our commitment to promote and conserve biodiversity, our Sustainability Action Plan includes our commitment to certify nature conservation or protection projects for at least 10 of our facilities by 2025.

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	Select from: ☑ No

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Yes (partial assessment)

(11.4.2) Comment

GFL's operations are subject to rigorous federal, state, province, and local environmental laws that include requirements to conduct environmental assessments to establish new or alter existing facilities. Part of any environmental assessment would include the need to consider potential impacts to surrounding areas including areas of high biodiversity, heritage, or other value.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ Not assessed

(11.4.2) Comment

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:
☑ Not assessed

(11.4.2) Comment

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☑ Not assessed

(11.4.2) Comment

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party	Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party	Explain why other environmental information included in your CDP response is not verified and/or assured by a third party
	Select from: ☑ No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years	*Select from:* ☑ Other, please specify: See opposite	*We anticipate expanding the information that is verified and/or assured by a third party in future years.*

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Executive Vice-President, Strategic Initiatives

(13.3.2) Corresponding job category

Select from:
☑ Other C-Suite Officer
[Fixed row]