GFL GREEN FOR LIFE environmental

2024 CLIMATE REPORT

Aligned with the recommendations of the Task Force on Climate-related Financial Disclosures

September 2025 | gflenv.com

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1. About this report

This 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 our progress and the results of an independent third-party review conducted to confirm that our target is aligned with a 1.5°C pathway.

Our climate governance, risk-related processes and systems, and Sustainability Action Plan remain key parts of implementing our business strategy. Through the climate scenario analyses that we performed and documented in this report, we confirmed that they also help us address and mitigate climate-related risks to our business. We recognize that building and maintaining climate resilience in our business is an ongoing and evolving effort. For that reason, we will continue to update our climate scenario analysis as necessary and be transparent on our efforts through continued disclosure and periodic updates to this standalone report.

Unless otherwise noted, data and metrics are for the reporting period of GFL Environmental Inc. and those entities within its operational control (in this report "GFL", the "Company", "we", "our") between January 1st, 2024 and December 31st, 2024. All financial information presented in this report, consistent with GFL's financial reporting, is in Canadian dollars.

Subsequent events and impacts on this report – 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.

Forward looking statements

This report includes certain "forward-looking statements" and "forward-looking information" (collectively, "forward-looking information") within the meaning of applicable U.S. and Canadian securities laws, respectively. These include, but are not limited to, statements regarding our sustainability goals, including reductions in greenhouse gas emissions, use of renewable energy, biogas recovery, leachate management and recycling.

Statements containing forward-looking information are not historical facts nor assurances of future performance but instead represent management's expectations, estimates and projections regarding future events or circumstances. Forward-looking information is based on our opinions, estimates and assumptions that we considered appropriate and reasonable as of the date such information is stated and is subject to known and unknown risks, uncertainties, assumptions and other important factors that may cause the actual results, level of activity, performance or achievements to be materially different from those expressed or implied by such forward-looking information. Important factors that could cause actual results to differ, possibly materially, from those indicated by the forward-looking information include, but are not limited to, markets for renewable energy products, our operations, including organic growth in our recycling business, our ability to invest in landfill gas projects, our ability to invest in alternative fuel vehicles and the other factors described in the "Risk Factors" section of GFL's annual information form for the 2024 fiscal year filed on Form 40-F and GFL's other periodic filings with the U.S. Securities and Exchange Commission and the securities commissions or similar regulatory authorities in Canada.

There can be no assurance that the underlying opinions, estimates and assumptions will prove to be correct. Although we have attempted to identify important risk factors that could cause actual results to differ materially from those contained in forward-looking information, there may be other factors not currently known to us or that we currently believe are not material that could also cause actual results or future events to differ materially from those expressed in such forward-looking information.

The forward-looking information contained in this report represents our expectations as of the date of this report (or as the date it is otherwise stated to be made) and is subject to change after such date. However, we disclaim any intention or obligation or undertaking to update or revise any forward-looking information whether as a result of new information, future events or otherwise, except as required under applicable securities laws.

2. Climate strategy

At GFL, our vision is to be Green For Life. This vision is at the core of our business strategy and central to the services we provide to our customers. We implement our vision by providing accessible, cost-effective, and sustainable environmental solutions to our customers and the communities we serve. This includes the environmental solutions that we offer that help our customers achieve their sustainability goals.

Our Sustainability Action Plan has supported our vision and also builds on the important and unique role that our industry plays in supporting our customers in reducing their carbon footprint and enhancing their climate resilience. It is also an important part of our climate strategy that focuses on:

- Providing sustainable solutions to our customers that further enable them to avoid generating GHG emissions within their own footprint. These solutions include resource recovery through the materials recovery and recycling services we provide and the beneficial use of landfill gas as a source of renewable energy.
- Reducing direct GHG emissions from our operations, primarily through increased gas capture at our landfills, the use of alternative fuel vehicles in our fleet and the use of renewable electricity at our own facilities.
- Increasing the sustainability innovations that come from within our business by continuing to invest in our employees and our entrepreneurial and innovative culture.

We believe that our employees play an integral role in implementing our climate strategy. As part of our award-winning Environmental Innovation Program (EIP)[1], GFL's Annual Greenlight Innovation Workshop actively engages and enables our employees to convert their ideas into workable solutions which we believe will enhance our ability to meet our evolving customers' needs for accessible and cost-effective sustainable solutions. We call these solutions our next-generation and incubator Sustainability Value Initiatives (SVIs). These SVIs are initiatives we focus on in the short-term so we have solutions that can be implemented at scale in the medium- and long-term. Our next-generation and incubator SVIs that are climate-related include:

- Implementing technological improvements at our material recovery facilities (MRFs) to increase rates of recovery and types of materials that can be recovered.
- Increasing the organics recycling solutions we offer our customers.
- Conducting customer sustainability pilots to collect data to enhance our customers' understanding of their scope 3 emissions and the services GFL offers to help reduce those emissions.
- Fugitive emissions and energy resource management at our landfills including the testing and use of next generation surface emissions monitoring (e.g. satellites, aircraft, drones and fixed sensors) and data management systems
- Piloting/Using zero emissions vehicles.

Our climate strategy includes our Sustainability Action Plan, climate-related governance, and risk-related processes and systems. Implementing this climate strategy is a key part of our business strategy and also helps us address and mitigate climate-related risks to our business, making it more resilient to the potential impacts of climate change.

3. Governance

As part of our climate strategy, we have implemented a multi-layered governance structure (**Figure 1**) that incorporates input and action from all parts of GFL, including our frontline and operations managers, employees (through participation in our Environmental Innovation Program), business managers, executive leadership and GFL's Board of Directors. We believe that this top-down and bottom-up approach provides the appropriate oversight and guidance for the implementation of our climate strategy and helps us achieve the climate-related goals, targets and commitments in our Sustainability Action Plan.

3.1. Board oversight of climate-related risks and opportunities

3.1.1. Board of Directors

Our Board of Directors (the Board) is responsible for providing oversight of and guidance on our strategic direction. As part of this oversight, the Board is responsible for monitoring the identification and management of material risks to our business and opportunities being pursued by the business, including risks and opportunities that are climate-related.

The Board meets on a quarterly basis with additional meetings called as needed to address specific issues as they arise. The Board reviews our strategy, budgets, and business plans. The Board's oversight of climate-related issues includes major capital expenditures for acquisitions and investments in infrastructure that will help us achieve our climate-related Sustainability Action Plan goals, targets and commitments and implement our business strategy.

Examples of such investments include replacing our diesel solid waste collection vehicles with compressed natural gas (CNG) or other alternative fuel vehicles, developing renewable energy facilities at our landfills, development of new material recovery facilities, investments in new technologies at our existing material recovery facilities to increase our recovery rates and investments in organics processing facilities that provide alternatives to traditional landfill disposal. In 2024, the Board met seven times.

3.1.2. Audit Committee

The Audit Committee oversees GFL's financial risk management, including financial risks related to climate change. This includes oversight over GFL's enterprise risk management process to identify and manage the key business risks and opportunities that could potentially have significant financial or social impacts on our business, including those that are climate-related.

The members of GFL's Audit Committee bring a diverse range of financial and risk-related experience having served as executive level management for national and international businesses that include large financial institutions, major retail chains and technology firms.

GFL's Risk Management Steering Committee (RMSC) oversees the implementation and management of our enterprise risk management process and reports to the Audit Committee.

The Audit Committee meets quarterly at a minimum and more frequently as required. In 2024, the Audit Committee met five times.

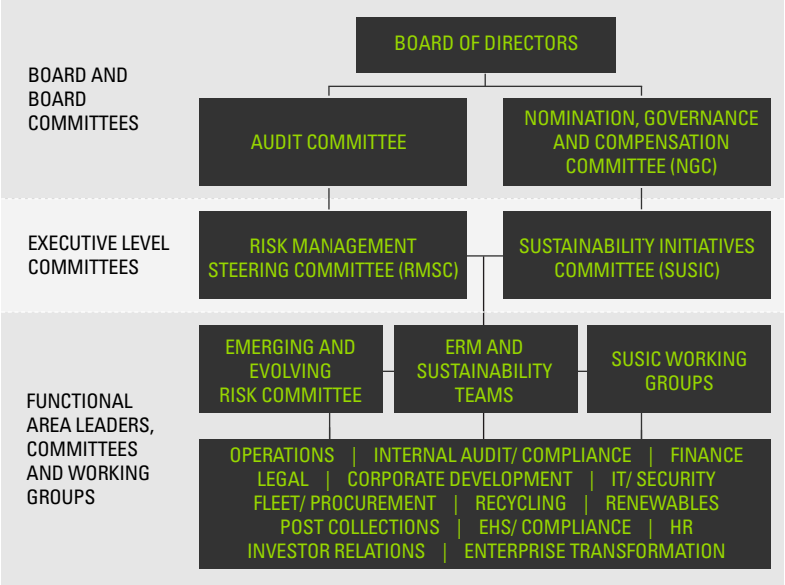

Figure 1: GFL governance structure

3.1.3. Nomination, Governance and Compensation Committee

The Nomination, Governance and Compensation (NGC) Committee is responsible for overseeing the implementation of our Sustainability Action Plan and our progress towards achieving the goals, targets, and commitments included in our Plan in the time frames in which they are to be achieved. Our Sustainability Initiatives Committee (SUSIC) provides recommendations to the NGC Committee on sustainability-related key performance indicators to ensure accountability for achieving our Sustainability Action Plan goals and commitments.

As part of its annual review of short-term incentive 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. In 2024, the NGC Committee met seven times.

The NGC Committee is also responsible for overseeing the ongoing education of the Board of Directors. In support of this, GFL has implemented an orientation and continuing education program for new and current directors. In 2024, the Company provided a number of educational sessions, including presentations on our sustainability related targets, goals and commitments.

3.2. Management's role in assessing and managing climate-related risks and opportunities

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). Some of the key responsibilities in managing climate-related risks and opportunities include: managing public policy engagement, directing the assessment of climate-related dependencies, impacts, risks and opportunities using methods like scenario analysis, implementing GFL's business and climate strategy, identifying and managing the completion of acquisitions, mergers, and divestitures, managing the integration of completed acquisitions, managing major capital and/or operational expenditures to ensure their alignment with our business and climate strategy, setting corporate targets and measuring progress towards achievement of those targets and setting employee incentives related to performance.

The executive-led RMSC and SUSIC committees bring together key functional area and business leaders to review and advise the executive management team, including the CEO, on key climate-related risks and opportunities. GFL's Sustainability team and Enterprise Risk Management (ERM) team lead internal and external engagement to identify, assess and track the management of our climate-related risks and opportunities. These two teams report to the EVP SI and CFO, respectively.

Tying Performance to Executive Compensation

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[2].

3.2.1. Risk Management Steering Committee

The RMSC is responsible for defining and managing our risk tolerance. It oversees the implementation of our enterprise risk management process to assess and mitigate operational, financial, strategic, reputational, employee, health and safety, legal and regulatory, information technology and climate-related risks and opportunities. The RMSC is composed of our senior executives including our CEO, CFO (committee chair), COO, CLO and EVP SI as well as other corporate Vice Presidents, including the Vice President, Risk Management.

Meetings of the RMSC are scheduled as necessary. In 2024, the RMSC reported to the Audit Committee on the implementation and management of our enterprise risk management process once.

3.2.2. Sustainability Initiatives Committee

GFL's SUSIC is composed of our CEO (sitting as committee chair), CFO, COO, CLO, EVP SI, Chief Strategy Officer and Head of Investor Relations, CHRO and other corporate Vice Presidents, including the Senior Vice President, Renewables, Environmental Responsibility and Sustainability.

The SUSIC is responsible for identifying our sustainability goals and strategies to ensure that sustainability continues to be integrated across our operations. The Committee and its members also define key performance indicators to ensure accountability, at an operational level, for meeting the goals, targets and commitments that are included in our Sustainability Action Plan.

In 2024, the SUSIC met twice and provided semi-annual reports to the NGC Committee on the progress made towards implementing our goals, targets, and commitments in our Sustainability Action Plan.

As a sub-committee of the SUSIC, GFL's Sustainability Disclosure Sub-Committee composed of the CFO, CLO and the SVP Renewables, Environmental Responsibility and Sustainability is responsible for the review and oversight of our sustainability disclosures. This includes information in our annual Sustainability and Climate Reports and supplemental reports[3]. Meetings of the Sustainability Disclosure Sub-Committee are scheduled as required.

3.2.3. Risk integration within functional areas and business operations

Day-to-day business operations are managed at the local or asset level. With the support of functional areas (like Environmental Health and Safety and Compliance), local managers continuously assess risks and opportunities impacting their businesses, including potential acquisition opportunities, competitive pressures, organic growth plans, market dynamics and pricing, and the potential impact of existing and proposed legislation.

The local assessment of risks and opportunities is reviewed annually at the corporate level through our annual budget process. Quarterly operational and strategic business reviews are also held between executive and senior operations management to review and discuss our business strategy and identify trends impacting the business as a whole and specific to the various regions in which we operate. Strategies to address identified market risks or pursue identified opportunities are also reviewed and discussed.

GFL's Sustainability team and ERM team play an important role in identifying, assessing and highlighting climate-related risks and opportunities to functional area leaders and local and senior managers in advance of these strategic reviews. The Sustainability team also works to identify and implement steps required to progress our Sustainability Action Plan, including, for example, recommending or creating cross-functional working groups, like our Landfill Gas Working Group, which includes a cross-section of employees from our sustainability, landfill management, renewable natural gas development, health and safety, and environmental compliance teams that work together to implement best practices for landfill gas management at our landfills.

4. Evaluating our climate resilience

To evaluate our resilience to potential climate-related business risks, we conducted a screening level climate scenario analysis of both physical and transition risks and opportunities. The information from this screening level analysis was further evaluated by conducting a more detailed climate scenario analysis of certain risks and opportunities to determine their incremental potential impact on our business over various time horizons. Both the screening level and more detailed climate scenario analyses were performed by a third-party climate consultant.

This section of our Climate Report reviews the potential climate-related risks and opportunities that have or could have an impact on our business, strategy and financial planning. For those climate risks where we performed more detailed analysis, we provide additional discussion and GFL's response to these risks. This section also summarizes the climate-related growth opportunities that we are pursuing.

Our review of the information we presented in our 2023 Climate Report confirmed that our previous analyses and identified risks and opportunities we presented in that report are still valid. Where applicable, we have updated previous disclosed information with relevant information for our 2024 calendar year.

4.1. Time horizons and climate scenarios

For consistency in our analyses of risks and opportunities, we have established and defined the following time horizons:

- **Short-term (ST) 0 to 3 years:** Our short-term time horizon is aligned with broader operational, financial and strategic planning timeframes.
- **Medium-term (MT) 3 to 10 years:** Our medium-term horizon is aligned with capital decisions such as those related to our fleet.
- **Long-term (LT) 10 to 30 years:** Our long-term time horizon is aligned with larger infrastructure capital decisions including the development and construction of material recovery facilities, organics processing facilities, landfills, and landfill renewable energy facilities.

The specific time horizons considered in our climate scenario analysis of our risks included 2030 and 2050, which fit into our medium and long-term time horizons respectively. These dates were selected as they are key target dates for addressing climate change as noted by the Intergovernmental Panel on Climate Change (IPCC) to limit global warming to 1.5°C above pre-industrial levels[4].

The climate scenarios we considered along with their defined global temperature rise and the risks they were used to assess are as follows:

- IPCC Representative Concentration Pathways (RCPs)
  - Acute Physical Risks: RCP4.5 (2°C), RCP8.5 (4°C)
  - Chronic Physical Risks: SSP2-4.5 (2.7°C), SSP5-8.5 (4.4°C)
- Network for Greening the Financial System (NGFS)
  - Transition Risks: Nationally Determined Contributions (~2.5°C)
  - Transitions Risks: Net Zero 2050 (1.5°C)
- IEA
  - Transition Risks: Stated Policies (~2.5°C)
  - Transition Risks: NZE 2050 (1.5°C)

Detailed information on these climate scenarios is provided in **Appendix A**.

4.2. Summary of potential climate-related risks and opportunities

In our annual financial reporting[5] we identify risks and opportunities that have the potential to impact our business including key climate-related risks and opportunities. The information in **Table 1** on the following pages broadly summarizes these climate-related risks and opportunities including a brief description of how they have the potential to impact our business operations and their expected impact on our company strategy and financial planning. The most likely time horizon(s) in which the risk impact may apply and location in our 2024 Annual Report (AR) is also identified.

Table 1: Potential climate-related physical and transition risks and opportunities to GFL

Risk Type(s)	Time Horizon(s)	Description of Risk and Potential Impact to GFL (Business, Company Strategy, and Financial Planning)	AR (Page ref.)
Acute	**ST | MT | LT**	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. Using predictive climate models, we assessed which of our assets/ locations are exposed or vulnerable to acute hazards like tropical cyclones (hurricanes), extreme precipitation, ice days, heavy snowfall, drought, extreme heat, and wildfires using three time horizons (short-, medium- and long-term). 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. A more detailed discussion of potential impacts is provided in **Table 2, Risk 1**. 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 provided critical services to support the cleanup and recovery efforts following Hurricane Beryl, which affected large parts of the southern United States.	**17**
Chronic	**MT | LT**	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. For example, these policies provide instruction on the frequency and duration of hydration breaks as temperatures increase. 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. Examples of this analysis are provided later in **Table 2, Risk 2**.	**17**
Market	**ST | MT | LT**	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. In our recycling business, GFL recovers, purchases and sells recyclable materials, some of which are priced on a commodity basis. As a result, our operations are, and will continue to be, affected by changes in 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. We estimate that a ± 10% change in the average of recycled commodity prices from the average prices that were in effect as of December 31, 2024 and 2023, would have had a ± $17.9 million and ± $10.7 million impact on revenues for the year ended December 31, 2024 and 2023, respectively. 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. This legislation influences market conditions where we operate by shifting the responsibility for collection and processing of recyclables from municipalities to the producers of the recyclable materials and mandating higher recovery rates. We are leveraging being the first waste industry participant in North America to operate under an EPR regime (GFL is the sole contractor to Recycle B.C., which is the producer-led EPR system currently operating in British Columbia, Canada) to secure EPR contracts in Ontario and Quebec, Canada where new EPR regimes have been implemented. We also see additional new opportunities in other Canadian jurisdictions which are looking to implement EPR programs including the Atlantic provinces, Alberta, Saskatchewan, and Manitoba, and continue to monitor legislative developments in U.S. jurisdictions where we have operations.	**9-12, 14, 22**

Table 1: Potential climate-related physical and transition risks and opportunities to GFL (continued)

Risk Type(s)	Time Horizon(s)	Description of Risk and Potential Impact to GFL (Business, Company Strategy, and Financial Planning)	AR (Page ref.)
Technology	MT | LT	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. For example, new technology may emerge that increases recovery rates at our resource recovery facilities (organics composting or material recovery facilities) which may reduce the volume of products that enter the waste stream. 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. The EIP focuses on investing not only in the solutions that we know can work today (core SVIs) but also in those that will be required in the future (our next generation and incubator SVIs). For example, through our SVI focused on fugitive methane emissions and energy resource management, we are piloting various technologies and collaborating with our peers to improve the quantification and accuracy of methane emissions measurement at our landfills. More information on how we are continuously improving the measurement of our emissions including these and other initiatives is provided in **Section 6.3** of this report.	15, 17
Policy and Legal	MT | LT	We are subject to substantial government regulation that may increase or change over time. Regulations may impose restrictions on our business or how we manage our assets including the need to obtain and comply with new or existing permits and licenses and potentially more stringent terms and conditions for existing permits and licenses for certain parts of our operations such as our collections, recycling and disposal facilities and fleet. Examples of regulations that we included in our climate risk assessments are landfill air emission requirements, carbon pricing regulations and renewable fuel standards that impact the price of fuel used in our operations or the market for and pricing of renewable natural gas (RNG). We also recognize that GHG emissions from our landfills could be vulnerable to new and evolving policies or regulations imposed by governments to address climate change, including a price on carbon. As the core of our climate strategy is to continue to be a circular economy and climate leader, and to help guide this strategy, we have set GHG emissions reduction targets aligned with limiting global warming to 1.5°C. More information on our scope 1 and 2 GHG emissions reduction target is provided in **Section 6** of this Climate Report. As part of our internal scenario analysis, we examined actions we would need to take if policies that have been currently stated were implemented. In this scenario, we determined that the GHG reduction levels that we would be required to achieve if these regulatory actions were implemented would be less than our 30% reduction target. Implementing these actions would also not exceed our threshold of substantive climate-related financial impacts (see **Section 4.3**). New or evolving carbon pricing policy also has the potential to impact the cost of fuel that we use in our operations primarily to fuel our fleet. The analysis that we conducted indicates that implementing the goal in our Sustainability Action Plan to convert a portion of our fleet from diesel to CNG powered vehicles, would significantly reduce the potential financial impact of the implementation of these carbon pricing policies, and may present a positive opportunity, taking into account the incremental positive return on investments from revenue generated on RNG that we produce and dispense from our own landfills and convert to CNG to fuel our own vehicles, as well as any applicable credit value for such RNG. **Table 2, Risk 3** provides more details on the risk scenario analysis we performed. Increased focus by regulatory agencies, investors, lenders and civil society more broadly may result in expanded mandatory reporting, diligence and disclosure on topics such as climate change and other environmental and social risk issues. If we do not comply with these requirements, our reputation could be materially and adversely affected or we may be subject to legal claims or regulatory actions, any of which may have a material adverse effect on us. To manage this risk, GFL has established governance mechanisms to provide oversight over our regulatory obligations, including subject matter experts within our Environmental Management System, and internal working groups which actively monitor and advise our operations on the potential impact to our business of evolving environmental and climate reporting regulations. GFL is also an active stakeholder in organizations like the National Waste and Recycling Association (NWRA), and the Environmental Research and Education Foundation (EREF) in working, along with other member companies and stakeholders, to provide our industry perspective on the potential financial and operational impact of such new climate legislation.	8-11, 13-15, 19-20, 22
Reputation	MT | LT	Climate change reputational risk is always included in our analysis due to the risk of changing customer or community perceptions of an organization's contribution to or detraction from the transition to a low-carbon economy. Increasing environmental concerns and demand for more stringent regulations on emissions could negatively affect the reputation of organizations like GFL operating within the environmental services industry. Given our focus on providing environmental solutions that mitigate the impacts of climate change and improve material circularity (such as through landfill gas to renewable energy projects and expanding our recycling and composting operations) we believe that GFL is well positioned to strengthen our customer's perception of our brand because of our positive contribution to the active management of environmental issues and providing solutions that address climate change concerns.	16-20, 22

4.3. Climate resiliency

Table 2 provides a more detailed discussion on specific risks and opportunities and their potential impacts to our business strategy as well as our management response.

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 $40 million in a fiscal year. In addition, depending upon the severity of the impact, any of the impacts described in the next paragraph alone or in combination could have a substantive financial or strategic impact on our business.

Strategic impacts and indirect financial impacts that we assessed included: 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.

Table 2: Specific climate-related risks and opportunities, potential impacts and management responses

Risk Type	Potential Impacts to Business	Management Response
Risk 1: Extreme weather events (Physical, Acute) Primary analysis focused on our facilities along the east coast of Canada and the United States due to the potential impacts from tropical cyclones.	Our operations can be adversely affected by inclement or severe weather, which could impact our ability to collect, process and dispose of waste materials in a timely manner (or at all), reduce the volume of waste materials delivered to our disposal sites or delay construction activities at our facilities. Severe weather events may also cause us to incur incremental labour, maintenance and equipment costs and penalties (related to delays in providing our services), some or all of which we may not be able to recover from our customers. These events could also increase the costs of insuring our assets against the risk of loss or result in the inability to secure insurance coverage or adequate insurance coverage at a reasonable price. Our facilities located in the southeastern and southern coastal U.S. are particularly susceptible to tropical cyclones and storms and we have seen an increase in frequency and severity of weather-related incidents in the past several years. In addition, other events like winter storms or climate extremes resulting from climate change also force us to temporarily suspend some of our operations and, as a result, affect our operating results in the affected regions or markets. When these events occur, our services are also key to supporting our customers and communities with their resilience through post-event recovery, cleanup and preventing additional environmental damage and contamination.The analysis of the potential financial impacts considered direct costs due to damage to our facilities as well as indirect costs due to loss of revenue relative to the current exposure/risk levels. Using both 2°C and 4°C-aligned climate scenarios (RCP4.5 and RCP8.5) the analysis focused on GFL locations along the southeastern and southern coastal U.S. as well as coastal locations in eastern Canada. **Appendix A** provides further information on how this analysis was conducted. Looking at 2030 and 2050 timeframes, our analyses determined the incremental direct (damage) and indirect (loss of revenue) financial impacts from these types of events to be low to moderate and well below our definition of substantive financial impacts.	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 are allocated to address both risks and opportunities. Quarterly operating reviews report on effectiveness of 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 all upcoming events including putting clean-up equipment and back-up generators on stand-by for quick mobilization. Our environmental and health and safety management systems require the development of and training on emergency response plans including tropical cyclone response plans for specific facilities in at-risk regions.

Table 2: Specific climate-related risks and opportunities, potential impacts and management responses (continued)

Risk Type	Potential Impacts to Business	Management Response
Risk 2: Increased seasonal precipitation (Physical, Chronic) Our analysis focused on potential impacts from increased leachate production at our landfills.	Significant and sustained increases in leachate from our landfills due to increasing precipitation could cause us to incur additional capital expenditures related to increasing the capacity of our leachate handling and treatment facilities and increased operating costs for discharging leachate into sewer systems and trucking excess leachate offsite to third-party facilities. Given the number of landfills that we operate, we prioritized the analysis of potential impacts from increased leachate production. Financial impacts from increased leachate production due to increased precipitation, particularly in winter and spring, were estimated using SSP2-4.5 (2.7°C) and SSP5-8.5 (4.4°C) climate scenarios for 2030 and 2050 time-horizons and were determined to be well below our definition of substantive climate-related financial impacts.	We address potential leachate impacts through best practices and strict regulatory compliance. Key measures include: **Permitting**: Our landfills require permits that ensure facilities are designed and operated to prevent impacts to the environment. Regulators conduct regular inspections to verify compliance. **Engineering Controls**: We use advanced capping, liners, and leachate collection systems to prevent off-site contamination. Sites may also include stormwater ponds and oil-water separators to control and treat precipitation. **Treatment and Disposal**: Collected leachate is commonly sent off-site for treatment at approved facilities. Some of our landfills have approved facilities for the onsite treatment and discharge of leachate to the environment. **Monitoring**: Ongoing stormwater and groundwater monitoring helps identify any environmental impacts. **Expert Oversight**: A dedicated Director of Wastewater Treatment supports the implementation of these measures. **Capital Investment**: Landfill development costs include land acquisition, excavation, liners, monitoring wells, gas and leachate systems are estimated to final permitted capacity.

Table 2: Specific climate-related risks and opportunities, potential impacts and management responses (continued)

Risk Type	Potential Impacts to Business	Management Response
Risk 3: Increases in fuel costs resulting from policy-related impacts on market prices, including a price on carbon. (Transition, Policy, and Legal)	GFL uses vehicles in the conduct of its operations which, as of December 31, 2024, included over 7,147 solid waste collection vehicles across Canada and the United States. Many of these vehicles use diesel fuel and 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 the implementation by governments of carbon pricing systems. GFL implements a surcharge pricing strategy across our business to recover fuel and other environmental compliance costs and allow us to manage our fuel costs in areas with existing or anticipated carbon tax systems. However, if there is 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 has already been operating with a carbon tax pricing regime in effect across Canada[6] for more than five years, which has not had a significant negative financial impact on our financial results. Other strategies that we use to manage this risk include periodically entering into fuel hedging agreements, and fixed-price fuel purchase contracts as part of our fuel costs management strategy. The climate scenario analysis we performed for this risk included evaluating both carbon and fuel pricing scenarios published by the IEA and the NGFS. This analysis quantified the potential increase in our fleet fuel costs resulting from the transition to a low-carbon economy. We considered two climate scenarios: the 1.5°C 'Net Zero' scenario from both the IEA and NGFS, and the 2.5°C 'Stated Policies' scenario from the IEA, along with the Nationally Determined Contributions 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 goals of converting a portion of our fleet to CNG and using RNG to fuel a portion of our fleet, and a high mitigation scenario aligned with GFL's Sustainability Action Plan, where we meet the goals we have set for fleet conversion to CNG or alternative fuel vehicles. The goals set out in our Sustainability Action Plan related to fleet conversion are: 50% of our annual solid waste vehicle replacements be with CNG or alternative fuel vehicles and powering 85% of our U.S. fleet with RNG. Using this methodology, our analysis estimated a potential annual fuel cost increase ranging from 19% to 31% by 2030, compared to 2024 levels (under the 2.5°C and 1.5°C 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 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 1.5°C scenario) or could present an opportunity for GFL under the 2.5°C scenario.	Our 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. Our capital planning already includes replacing older fleet with new vehicles but the initial capital cost of CNG or alternative fuel vehicles may be higher than that of replacement diesel powered vehicles and may also be negatively impacted by increasing demand for CNG or alternative fuel vehicles. For every 100 vehicles that require replacement, we estimate the financial implication of responding to this risk to be approximately $8.8M of incremental capital allocated to purchase the CNG vehicles and upgrade truck maintenance shops to service CNG vehicles. Between 2024 and 2030 (a 6-year period), we estimate upgrading between 1,500 and 2,000 trucks. The positive return on investment (ROI), per 100 trucks, from this fleet transition effort is estimated to be approximately $9.6M over the 6-year period using 2024 inputs. The positive ROI calculated assumes the following components: fuel cost savings from using CNG fuel versus diesel fuel[7], revenue from the portion of RNG that is used in the fleet that is produced by GFL[8] and credit value from dispensing CNG and RNG and the US Federal Fuel Tax Credit. Also included in our Sustainability Action Plan is a commitment as part of our EIP 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 NWRA and national trucking associations, we also comment on evolving legislation to communicate the perspective of the environmental services sector.

Table 2: Specific climate-related risks and opportunities, potential impacts and management responses (continued)

Risk Type	Potential Impacts to Business	Management Response
Opportunities: Growth in recycling services and producing RNG at our landfills (Resource Efficiency, Energy Source, Products and Services, Markets, Resilience)	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.	In 2024 we allocated up to $300 million to incremental growth investments related to RNG projects and investments in material recovery facilities and other infrastructure primarily related to opportunities arising under EPR legislation. For 2025, we have allocated approximately $325 million for these types of investments. The capital allocations for 2024 and 2025 represent a portion of what is needed to realize the overall opportunity. The financial effects for the recycling- and RNG-related investments, by 2028, are expected to be between $160 and $190 million incremental Adjusted EBITDA 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. The pathway to meeting our goal of increasing our recyclables recovered at our own material recovery facilities (MRFs) by 40% by 2030 is through increasing the volume of recyclables received, continuing to make investments in sophisticated sorting technologies, and expanding our sorting capacity at our MRFs to meet increasing customer demand. The EPR opportunity described here will also help us in achieving our recycling goal. We are currently leveraging being the first waste industry participant in North America to operate under an EPR regime (GFL is the sole contractor to Recycle B.C., which is the producer-led EPR system currently operating in British Columbia, Canada) to secure other EPR contracts in Ontario and Quebec, Canada. We also see additional new opportunities in other Canadian jurisdictions which are looking to implement EPR programs including the Atlantic provinces, Alberta, Saskatchewan and Manitoba. 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. Since 2021, we have been focused on accelerating the development of renewable energy projects that convert methane recovered from landfill gas to renewable energy, including RNG at our landfills[9]. 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.

The opportunities presented in **Table 2** are expected to have a positive financial impact in the short- and medium-term and are an important part of GFL's overall business strategy to drive organic growth, while at the same time building our resilience to climate-related impacts to our business operations and finances.

Table 3 identifies the Sustainability Action Plan targets that we have set that relate to these opportunities and shows how they align with the types of climate-related transition opportunities that TCFD identifies in their recommendations. Such close alignment underscores our confidence in advancing these initiatives.

Table 3: Climate-related growth opportunities for GFL

Related GFL Sustainability Action Plan Target	Summary of Opportunity	Types of Opportunities Identified by TCFD				
		Resource Efficiency	Energy Source	Products/ Services	Markets	Resilience
Increase recyclables recovered at GFL MRFs by 40% by 2030	• Use of recycling • Access to new markets • Resource substitutes/ diversification	☑		☑	☑	☑
Increase beneficial use of biogas from landfills 2x by 2030	• Use of new technologies • Participation in carbon markets • Development of climate adaptation solutions • Access to new markets • Reduced GHG emissions from operations	☑	☑	☑	☑	☑

GFL Material Recovery Facility, Mayville, WI

5. Risk management

GFL identifies, assesses, and responds to climate-related risks and opportunities through both specific climate-related and integrated risk management processes. These two processes and how they align with our enterprise risk management (ERM) process are described below.

5.1. Identification and assessment of risk – specific processes

GFL's Sustainability team conducts periodic reviews of the functional areas of the business listed below, to identify potential climate-related risks and opportunities based on emerging science, policy and regulations, macrotrends and peer benchmarking. These reviews also include tracking our operations, GHG emissions and preparing forecasts of our pathways to achieving our GHG reduction targets that are part of our Sustainability Action Plan and other metrics we track to ensure appropriate mitigation of our climate-related risks.

The Sustainability team also tracks progress toward our targets for climate-related growth opportunities (**Table 3**). These are the resource recovery services and renewable energy products that we provide that help our customers avoid GHG emissions in their operations. When needed, our Sustainability team also works directly with our operations, functional area and executive leaders to support them in achieving progress towards our targets. The team has a broad range of expertise in the areas of sustainability project management, engineering, GHG accounting, environmental analysis, risk management and business-case analysis.

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 engaged a third-party climate consulting firm to conduct climate risk scenario analysis that focused on the physical risks to GFL's assets and business operations in the short-, medium-, and long-term.

Risks identified and analyzed as part of our climate scenario analysis are integrated into our ERM program. This process is described below.

5.2. Identification and assessment of risk – integrated processes

Addressing climate-related risks and opportunities is part of the following functional areas, programs, processes and systems: capital planning for landfills, fleet, and other facilities, our environmental management system, our Safe For Life program, quarterly operating and strategic business reviews, annual budget reviews, our EIP, and supply chain management.

For example, risks and opportunities related to severe weather events are included in our annual capital planning, our Environmental Management System, our Safe For Life program, as well as our budget reviews, and quarterly and annual operating and strategic business reviews.

Addressing seasonal changes in our operations

The following provides an example of how our operations develop and implement processes to manage risk arising from seasonal weather conditions and their potential impacts on our employees and our operations.

Each season brings changes that lead to unique safety challenges. Heavy precipitation and flooding in the spring, potentially extreme heat in the summer, reduced daylight starting in the fall and snow and ice in the winter are just a few examples of the changing conditions our drivers face as they perform their duties throughout the year.

Our Seasonal Safety Campaign was created to help our teams address these challenges. Each campaign provides employees with seasonal information including a single page of topics that address or highlight specific safety concerns and mitigation procedures for the particular season along with a season preparation checklist. While many of these topics are already part of our annual training, our seasonal campaigns help increase awareness through a more consistent thread and theme with a focus on improving and further strengthening our safety program using situational awareness concepts.

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 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 (like the introduction of 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. At these meetings they review our business strategy and identify trends impacting our business as a whole and in our individual business regions, as well as best practices to address those risks and opportunities, including risks to be addressed or opportunities to be pursued by us that are climate-related.

Our Sustainability team along with our ERM team play an important role in these discussions with local operations and corporate functional areas.

5.3. Climate risk assessment and our ERM program

To enhance our ability to identify and manage risks locally, through our ERM program, we created an Emerging and Evolving Risk Committee (EERC). The EERC consists of a select group of senior leaders from all parts of the business. The focus of the EERC is to drive better risk management through meaningful discussions and help create greater understanding of the benefits of proactive risk management processes across our operations and with our functional business leaders.

On the topic of climate, the ERM team works with the Sustainability team to:

- Provide input on climate risk identification and assessment processes, to ensure alignment with the ERM program.
- Ensure that the key risks identified through climate-related risk analyses are brought forward to the EERC and incorporated into our ERM as appropriate.
- Jointly identify and highlight to our local and senior managers the climate-related risks and opportunities that are relevant to their local operations and corporate functions.

6. Metrics and targets

6.1. Scope 1 and 2 emissions reduction target

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:

- **Pillar 1:** A reduction in landfill methane emissions at a level aligned with the Global Methane Assessment.
- **Pillar 2:** A reduction in fleet emissions at a level aligned with the Science Based Targets initiative's Absolute Contraction Approach for Transport.
- **Pillar 3:** 100% renewable electricity use 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-noted 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.

Figure 2 below illustrates GFL's decarbonization pathway to achieve the science-aligned targets described above, and in **Section 6.2** below. The business-as-usual trajectory reflects the projected growth of our emissions if we did not implement the decarbonization actions described in this report.

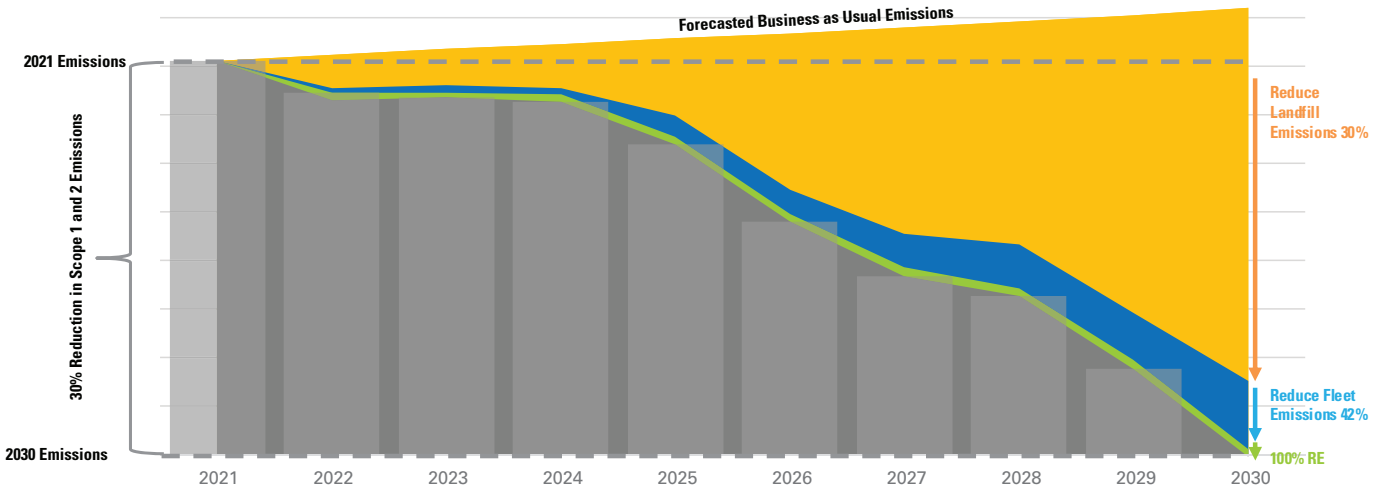

Figure 2: GFL's Decarbonization Pathway

6.2. Setting a science-aligned GHG emissions reduction target

Our approach to target-setting integrates distinct science-based pathways for different types of emissions. This hybrid approach, addressing methane and carbon dioxide emissions separately, is a **first for the industry** and consistent with the recommendations of the IPCC[10] and UN High-Level Expert Group on the Net Zero Emissions Commitments[11]

6.2.1. Methane emissions

Over 80% of our 2021 scope 1 and 2 emissions are from fugitive methane emissions from landfills. Reducing methane emissions is widely regarded as the single most effective strategy to keep the goal of limiting warming to 1.5°C within reach as more than half of global methane emissions stem from human activities in three sectors: agriculture (40%), fossil fuels (35%) and waste (20%)[12].

GFL's methane reduction target aligns with the Global Methane Pledge (GMP), launched at COP26 in 2021 and now supported by over 150 countries. The GMP commits to reducing global methane emissions by at least 30% from 2020 levels by 2030. This commitment is grounded in the findings of the Global Methane Assessment (GMA), which modeled the climate and air quality benefits of significant methane reductions in line with the IPCC's 1.5°C scenario.[13].

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 is equivalent to the reduction of more than 1.2 million tonnes of carbon dioxide emissions[14].

This target reflects our leadership in methane mitigation, but also positions us to reduce the future costs of compliance with emerging methane regulations and carbon markets.

6.2.2. Carbon dioxide emissions

Fleet fuel emissions account for nearly 15% of our 2021 base year scope 1 and 2 emissions. Emissions from upstream electricity generation, which make up the entirety of our scope 2 emissions, are also included in the carbon dioxide portion of our emissions reduction target.

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[15]. It supports the transition to lower-emission fuels and vehicles across our solid waste collections fleet. It reflects the need to reduce emissions from our fleet operations, which are a significant contributor to our scope 1 GHG emissions.

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[16]. 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 electricity used in our operations from renewable sources by 2030**[17].

Together, our fleet and electricity related targets support our broader climate strategy by addressing two of our most significant sources of carbon dioxide emissions. These efforts not only contribute to global decarbonization goals but also help GFL mitigate fuel cost volatility, prepare for evolving regulatory requirements, and position our operations for long-term resilience in a low-carbon economy.

6.3. Progress on our scope 1 and 2 emission reduction target

Our GHG reduction target covers all scope 1 and market-based scope 2 emissions within our GHG inventory[18]. In the 2024 reporting year, we recalculated our 2021 base year emissions, consistent with the GHG Protocol, to reflect acquisitions, divestitures, methodology improvements for landfill gas modeling, updates to activity data, and the correction of identified errors. Full details on our GHG accounting methodology are available in **Appendix B**.

In 2024, GFL's scope 1 and 2 GHG emissions were 2.5% lower than our 2021 base year, representing progress of approximately 4% toward our 2030 target. **Figure 3** illustrates our performance relative to our scope 1 and 2 emissions reduction target[19]. Progress reflects coordinated action across all three pillars of our science-aligned strategy: reducing methane emissions from landfills, decarbonizing our collection fleet, and transitioning to renewable electricity.

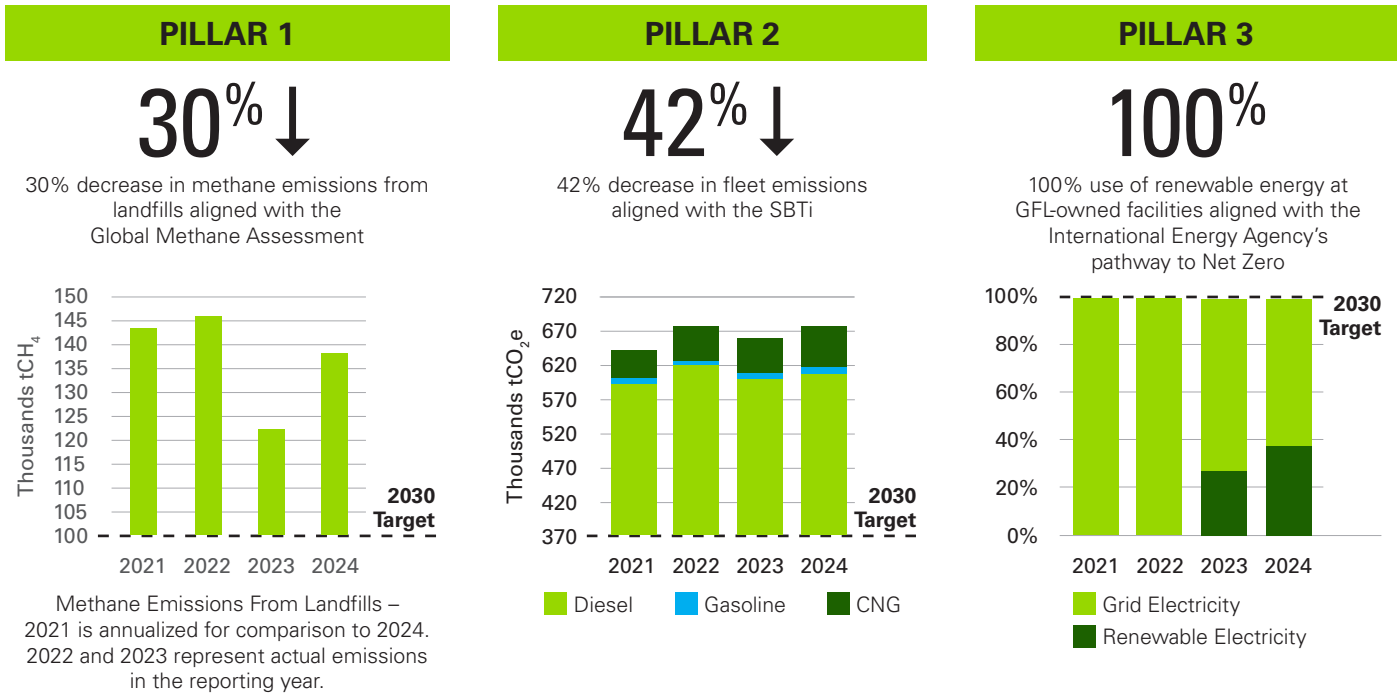

Figure 3: Progress towards our science-aligned targets

Landfill Methane Reduction: 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.

Fleet Emissions Reduction: While total fleet emissions have increased since 2021 due to organic 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.

Renewable Electricity: We advanced our transition to low-carbon energy by increasing the share of renewable electricity in our operations through purchases of renewable energy.

Continuous improvement on measuring our emissions and increasing methane capture at our landfills

We are diligently working on improving the quality and accuracy of our landfill emissions quantification through a range of initiatives, many of which have advanced through our Environmental Innovation Program. In 2024, these initiatives included:

- The piloting of technologies that included optical gas sensors for landfill leak detection and repairs, automated gas quality analyzers to facilitate the work of our infield technicians, and dewatering technology to help maintain conditions within the landfill for gas production and collection.
- Routine aerial monitoring (via drones or fixed-wing technology) at some of our larger landfills to monitor and help manage their emissions.
- Sponsoring or supporting studies being conducted by Canadian and American academic institutions on landfill emissions measurement.
- Engaging with industry associations, academics and regulators to provide comments on existing landfill gas emissions models that have resulted in updates to the Solid Waste Industry for Climate Solutions (SWICS) model and also providing comments on GHG emissions reporting regulations.

6.4. Metrics and targets used to assess climate-related risks and opportunities

We use a variety of metrics to assess, measure, and manage our climate-related risks and opportunities.

Our disclosures include over 100 environmental, social, and governance data points that we publish separately in annual data summaries available on our website. We will continue to add to our disclosures, as appropriate, to ensure that we remain transparent about our progress and the identification and management of our climate-related risks and opportunities.

Table 4 identifies key metrics that we track related to our climate-related risks and opportunities. The table also identifies the targets we have established to address these risks and opportunities.

Table 4: Key climate-related risks and opportunities - associated metrics and targets

Risk and Opportunities	Key Metrics	Established Targets Related to Risk or Opportunity
Risks:	• Extreme weather events (Risk 1): ◦ Insurance claims and incidents	• TRIR of 2.0 or less
	• Increase in seasonal precipitation (Risk 2): ◦ Leachate production and associated costs	• Not disclosed

	• Increase in fuel costs (Risk 3):
	  ◦ Scope 1 emissions (tonnes CO2e) related to fuel use
	  ◦ GHG emissions avoided (tonnes CO2e)
	  ◦ Fleet fuel consumed (all types)
	  ◦ Percentage of alternative fuel vehicles in fleet
	  ◦ Scope 3 emissions, fuel and energy related activities category
	  ◦ Credit value per DGE CNG or RNG used ($/DGE)
		• 42% reduction in scope 1 emissions from fleet fuel use
		• 50% of annual solid waste fleet replacements to be CNG or alternative fuel vehicles
		• 85% of our U.S. CNG fleet to be powered by RNG by 2030

	• Fluctuations in commodity prices (Risk 4):
	  ◦ Recyclable materials recovered at GFL MRFs (tonnes)
	  ◦ Commodity pricing and revenue
		• Not disclosed

Opportunities	• Growth in recycling services:
	  ◦ Recyclable materials recovered at GFL MRFs (tonnes)
	  ◦ Commodity pricing and revenue
	  ◦ Avoided GHG emissions – from recycling activity
		• Increase recyclables recovered at GFL MRFs by 40% by 2030

	• Growth in producing RNG at our landfills:
	  ◦ Landfill gas recovered for beneficial use (% captured MMBtu)
	  ◦ Scope 1 emissions (tonnes CO2e) and methane from landfills
	  ◦ Avoided GHG emissions (tonnes CO2e) – from the production of renewable energy at landfills
		• Increase beneficial use of biogas from landfills 2x by 2030
		• 30% reduction in scope 1 emissions (methane) from our landfills

A breakdown of our scope 1, 2 and 3 emissions and avoided GHG emissions from 2021 to 2024 is provided in **Appendix B**.

Appendix A: Additional climate scenario and assessment information

A.1. Risk assessment framework

Our physical and transition risk assessments were conducted using a standard risk assessment framework (**Figure A1**) that determined potential impact (the extent to which the risk affects us after consideration of risk mitigation measures) from assessing the three factors identified in the graphic below:

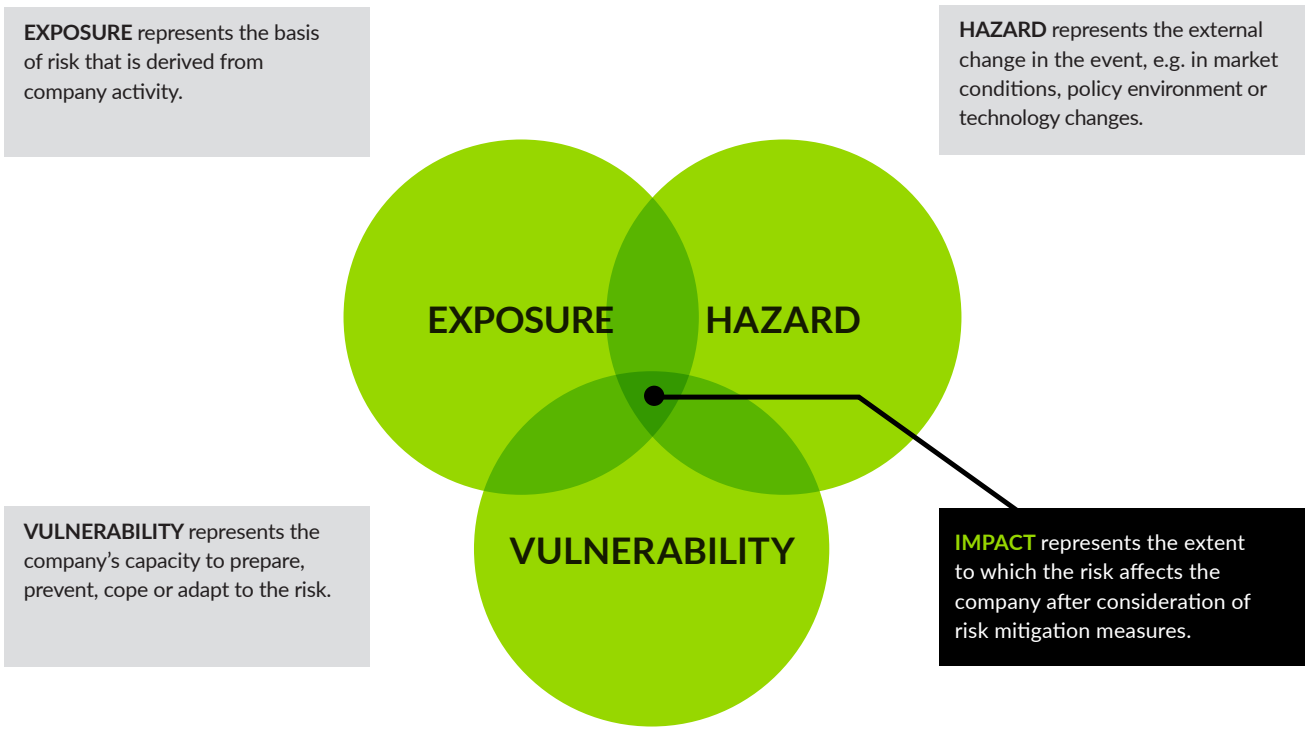

Figure A1: Risk Framework

A.2. Climate scenarios used

Table A1 on the following page describes the climate scenarios we used in preparing the information provided in this report along with assumptions made and rationale for their selection. Following the table, we provide an example of how we used the climate scenarios.

Table A1: Climate scenarios used in the assessment of risks and opportunities

Climate Scenario and Description	Assumptions
NGFS - Nationally Determined Contributions (NDCs). The NDCs scenario assumes that all pledged unconditional NDCs by governments are implemented, and energy and climate targets are achieved in all countries up to 2030, however it also assumes climate policies are insufficient to meet the Paris Agreement goals and global warming increases to around + 2.5°C.	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 NGFS. **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 Scenario and Description NGFS - Net Zero 2050. 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. This scenario assumes strong climate policies are implemented to significantly reduce global emissions.	**Assumptions** 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 NGFS. **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 Scenario and Description IEA - Stated Policies (STEPS). The STEPS scenario is a conservative climate scenario, assuming that not all announced and scheduled policies will be implemented.	**Assumptions** 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 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. **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.

Table A1: Climate scenarios used in the assessment of risks and opportunities (continued)

Climate Scenario and Description	Assumptions
IEA - Net Zero Emissions (NZE). The Net Zero Emissions (NZE) scenario is fully aligned with the Paris Agreement's goal to limit global warming to +1.5°C. It is similar to the NGFS Net Zero 2050 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 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. **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 Scenario and Description	**Assumptions**
IPCC - RCPs RCPs are scenarios used to predict future greenhouse gas concentrations and used in the assessment of physical risks. They were first used by the IPCC in their 5th Assessment Report. RCP 4.5 represents a moderate or middle-of-the-road scenario where emissions continue to moderately rise until about 2080 before stabilizing to 2100. While thought to be unlikely, RCP 8.5 represents a worst-case scenario where emissions rise significantly and continuously to 2100. These scenarios were used on their own and also in conjunction with a corresponding Shared Socio-economic Pathways (SSPs) as described.	RCP 4.5 and 8.5 were used to assess the impacts of tropical cyclones on GFL's operations. 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 to 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. SSP2-4.5 and SSP5-8.5 were used to assess impacts from changing precipitation patterns on GFL's landfill operations. Uncertainties include any inherent uncertainties and limitations with 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. **Rationale for Choice of Scenario** RCP4.5 is a 2°C 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. 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. SSP2-4.5 is a +2°C 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. SSP5-8.5 is a 4 degree Celsius aligned scenario 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.

A.3. Example of how climate scenarios were used in our analysis

Identifying assets at risk of tropical cyclones across GFL's North American portfolio, including solid waste management, liquid waste management, and soil remediation facilities, followed a two-step process:

- **Step 1:** Prioritization of sites historically impacted by coastal tropical cyclones (category one or higher on the Saffir-Simpson scale). These locations are shown in **Figure A2**.
- **Step 2**: Refinement of list created in Step 1 further based on tropical cyclone intensity and insurance value, focusing on high-value sites affected by lower-category cyclones and lower-value sites impacted by more severe storms.

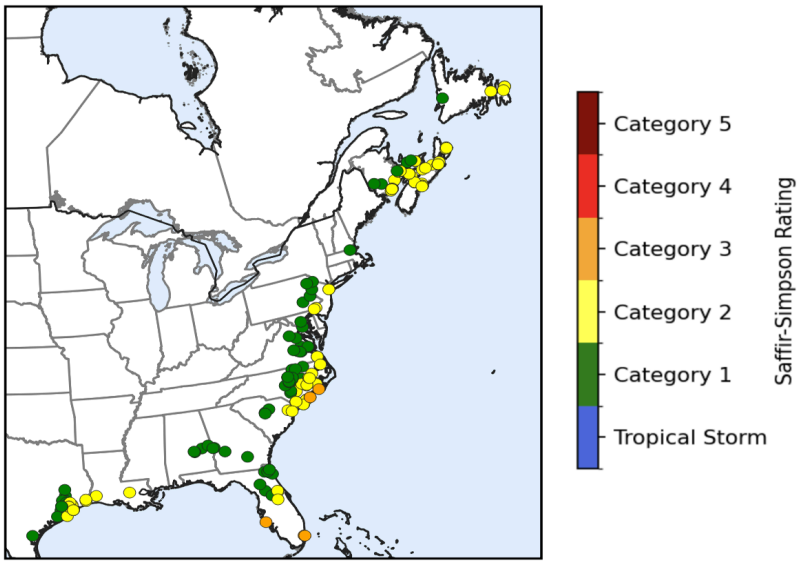

Figure A2: Prioritized sites historically impacted by tropical cyclones

Appendix B: GHG emissions and accounting approach

B.1. GHG emissions

A breakdown of our scope 1, 2 and 3 emissions and other relevant metrics from 2021 to 2024 is provided in **Table B1**. We report investment-related emissions in our scope 3 GHG emissions inventory, which includes our equity share of emissions from Green Infrastructure Partners and joint ventures related to GFL Renewables. In our 2025 reporting year, the Environmental Services business will also be included in our investment-related scope 3 emissions.

Table B1: GHG emissions and other relevant metrics[20]

Parameter	2021	2022	2023	2024
Total Scope 1 Emissions[21]	**4,726,654**	**4,832,611**	**4,158,435**	**4,630,217**
Landfill	4,014,284	4,082,699	3,424,037	3,866,533
Composting	22,734	31,457	30,629	23,194
Fossil Fuel Combustion – Mobile Sources[22]	654,501	692,514	671,827	690,910
Other Energy Use	35,135	25,941	31,943	49,580
Total Scope 2 Emissions[23]	**30,953**	**30,796**	**14,095**	**7,154**
Scope 2 Emissions (Location-Based)	30,953	30,796	34,412	33,090
Scope 2 Emissions (Market-Based)	Not Reported	Not Reported	14,095	7,154
Total Scope 3 Emissions[24]	**869,159**	**866,091**	**800,612**	**657,084**
Purchased Goods and Services	337,412	251,791	263,086	129,659
Capital Goods	116,277	145,107	192,546	108,467
Fuel and Energy-Related Activities	106,396	105,847	101,504	120,094
Transportation and Distribution	276,629	312,581	172,089	132,553
Waste Generated in Operations	682	1,242	1,213	1,347
Employee Commuting	30,663	34,336	34,204	32,268
Business Travel	1,100	3,178	3,324	3,558
Use of Sold Products[25, 26]	Not Reported	12,009	32,645	32,789
Investments[27]	Not Reported	Not Reported	Not Reported	96,349
Total GHG Emissions Avoided & Sequestered	**12,129,770**	**11,971,563**	**11,944,670**	**12,105,594**
Recyclables, Organics, and Other Recyclable Waste Streams	7,776,179	7,690,866	8,171,989	8,211,465
Renewable Energy Generation from Landfill Gas	279,443	201,303	233,508	153,555
Carbon Sequestered	3,943,262	4,079,394	3,539,174	3,740,574
Carbon Intensity				
Avoided GHG Emissions (tonnes CO2e) per Million Dollars of Sales[28]	1,482	1,167	1,118	1,540
Scope 1 emissions (tonnes CO2e) per Million Dollars of Sales	920	715	553	589
Scope 1 and 2 emissions (tonnes CO2e) per Million Dollars of Sales	926	719	555	590

B.2. GFL's GHG accounting approach

The calculation of our GHG emissions inventory is based on the GHG Protocol Corporate Accounting and Reporting Standard[29], the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for Waste Management[30], the Protocol for the Quantification of Greenhouse Gas Emissions from Waste Management Activities[31], and the SWICS documentation related to landfill gas emissions accounting.

GFL uses the operational control approach to define its organizational boundary. Under the operational control approach, GFL accounts for 100% of the GHG emissions from operations over which it can introduce operating decisions.

The categories of sources that generate scope 1 GHG emissions from GFL's operations include:

- Landfills, including construction and demolition (C&D) landfills and municipal solid waste (MSW) landfills that are active, closed, and inactive landfills. The emissions originate from fugitive methane emissions released from the surface of the landfill and combustion emissions released from landfill gas collection and control systems that combust the gas in a flare, and/or beneficially use the gas for electricity, heat or steam generation.
- Fuel combustion from on-road fleet, off-road fleet, and stationary combustion equipment (comfort heating and process-related).
- Aerobic composting facilities.

The categories of sources that generate scope 2 GHG emissions from GFL's operations include:

- Electricity use for office-related activities.
- Electricity use for facility operation- or process-related activities.

It is common in the waste sector for a landfill site to be controlled by multiple companies. In instances where GFL is in the role of service provider, where we are contracted by the landfill site owner to perform only specific tasks, such as waste placement and application of daily cover, or where GFL does not control the operation of the wellfield at the landfill, these sites are considered outside of our operational control from a GHG emissions inventory and management perspective.

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.

According to SASB and the GHG Protocol, GHG sources within the operational boundary should include (where applicable) the seven GHGs covered under the Kyoto Protocol: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF6), and nitrogen trifluoride (NF_3). GFL currently includes the following emissions related to energy consumption in scope 1 and scope 2 emissions: CO_2, CH_4, and N_2O.

No activities have been identified within GFL's boundary that result in material emissions from SF_6, HFCs, PFCs, or NF_3. Biogenic CO_2 is accounted for separately from scope 1 and 2 emissions.

According to SASB, emissions of all GHGs shall be consolidated and disclosed in metric tonnes of carbon dioxide equivalents (tCO_2e) and calculated in accordance with published 100-year time horizon global warming potential (GWP) values. GWP is a ratio of the time-integrated radiative forcing from the instantaneous release of one kilogram of a trace substance relative to that of one kilogram of a reference gas (i.e. CO_2). For consistency with EPA GHG reporting requirements, GFL's 2019 through 2024 GHG inventories use the IPCC AR-5 GWP values[32].

We maintain an annual GHG Inventory Management Plan (IMP) to document the boundaries, methods, findings, management, auditing and verification, and key references used to develop GFL's scope 1 and 2 GHG emissions, and related information. Related information includes non-GHG related air emissions, and energy (including fuel) production and usage. The GHG IMP is a living document that evolves alongside GFL's inventory process and internal governance and controls documents.

Our GHG emissions are verified annually by an accredited third-party auditor and our emissions are disclosed publicly on our website and through multiple ESG-platforms. Verifications are conducted in accordance with ISO 14064–3:2006 specification with guidance for validation and verification of GHG assertions to provide limited assurance on our annual scope 1, 2, and 3 GHG inventory.

B.2.1. Base Year and Recalculation Methodology

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[33]. 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.

Appendix C: Report alignment with TCFD Recommendations

The following is a quick reference table showing the page numbers where information relevant to each of the recommendations of the TCFD can be found in this report. Other relevant GFL disclosures are also listed.

Table C1: Report alignment with TCFD Recommendations

Core Elements and Recommendations	Additional GFL Disclosures
Governance a. Describe the board's oversight of climate-related risks and opportunities. (**pg. 5-6**) b. Describe management's role in assessing and managing climate-related risks and opportunities. (**pg. 6-7**)	• 2025 Proxy Circular • 2025 CDP Response, Section C4 - Governance
Strategy a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term. (**pg. 8-15**) b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning. (**pg. 8-15**) c. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario. (**pg. 4, 11-15**)	• 2025 CDP Response, Section C3 - Risks and Opportunities and C5 - Business Strategy
Risk Management a. Describe the organization's processes for identifying and assessing climate-related risks. (**pg. 16**) b. Describe the organization's processes for managing climate-related risks. (**pg. 16-17**) c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management. (**pg. 16-17**)	• 2024 Annual Report • 2025 CDP Response, Section C2 - Identification, assessment, and management of dependencies, impacts, risks, and opportunities
Metrics and Targets a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process. (**pg. 18-22, Appendix B**) b. Disclose scope 1, scope 2 and, if appropriate, scope 3 greenhouse gas (GHG) emissions and the related risks. (**pg. 19, Appendix B**) c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets. (**pg. 15, 18-22**)	• 2024 Data Summary • 2025 CDP Response, Section C7 - Environmental Performance

Endnotes

Section 2

1. GFL's Environmental Innovation Program was awarded a SEAL 2020 Business Sustainability Award, for excellence in specific environmental and sustainability initiatives. Key criteria for selection https://gflenv.com/news-media-events-detail/gfl-awarded-seal-award/.

Section 3

2. For more information on non-equity incentives see pages 31-33 of GFL 2024 Management Information Circular https://s24.q4cdn.com/409248530/files/doc_financials/2024/ar/Circular.pdf.
3. The latest progress on the implementation of our Sustainability Action Plan along with associated and historical reports are provided here: https://investors.gflenv.com/English/esg/sustainability/default.aspx.

Section 4

4. Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. https://www.ipcc.ch/sr15.
5. GFL 2024 Annual Report. https://s24.q4cdn.com/409248530/files/doc_financials/2024/ar/Annual-Report.pdf.

Section 4, Table 2

6. The federal fuel change in Canada was removed effective April 1, 2025.
7. Fuel price difference assumes the fuel price difference remains the same as it was in 2024.
8. Revenue and credit value for producing RNG in the US assumes a $2.50 USD D3 RIN.
9. GFL was awarded a SEAL Environmental Initiative Award for its renewable natural gas initiative at several of its landfills. The Environmental Initiative Award recognizes individual programs that demonstrate leadership and commitment to a sustainable future. Key selection criteria included demonstrating environmental impact, innovation and level of investment. https://www.prnewswire.com/news-releases/gfl-environmental-inc-awarded-2023-seal-business-sustainability-award-301834158.html.

Section 6

10. In the IPCC Special Report, GHG emissions are described as falling into two broad categories in terms of their impact on global temperature: long-lived GHGs, such as carbon dioxide, whose warming impact depends primarily on the total cumulative amount emitted over the past century or the entire industrial epoch; and short-lived climate forcers (SLCFs), such as methane, whose warming impact depends primarily on current and recent annual emission rates. These different dependencies affect the emissions reductions required of individual forcers to limit warming to 1.5°C or any other level. https://www.ipcc.ch/sr15/cross-chapter-boxes/.
11. The Report from the UN High-Level Expert Group on the Net Zero Emissions Commitments of Non-State Entities Integrity Matters: Net Zero Commitments by Businesses, Financial Institutions, Cities and Regions recommends that targets must account for all GHG emissions and include separate targets for material non-CO2 greenhouse gas emissions such as methane (Recommendation 2). https://www.un.org/sites/un2.un.org/files/high-level_expert_group_n7b.pdf.
12. United Nations Environment Programme and Climate and Clean Air Coalition (2021). Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions. https://www.ccacoalition.org/sites/default/files/resources//2021_Global-Methane_Assessment_full_0.pdf
13. United Nations Environment Programme and Climate and Clean Air Coalition (2021). Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions. Nairobi: United Nations Environment Programme. https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions.
14. Based on the IPCC AR-5100-year global warming potential for methane.
15. According to SBTi, the Sectoral Decarbonization Approach (SDA) Transport Tool is available to assist companies with modeling scope 3 targets only. This tool is not applicable for companies that own and/or control transport operations, such as GFL. These companies should use the Corporate Near-Term Tool.
16. IEA (2021), Net Zero by 2050, IEA, Paris https://www.iea.org/reports/net-zero-by-2050, Licence: CC BY 4.0.
17. GFL has based our 100% renewable electricity strategy and accounting approach on the GHG Protocol and Renewable Energy 100 (RE100) technical guidance.
18. All emission sources within our operational control boundary are included with a goal of an absolute 30% reduction in GHG emissions across scope 1 and 2 emissions sources. On an emission source category basis, it is anticipated that some source categories like fugitive emissions from landfills will decrease, while other source categories such as those that are aligned with our anticipated growth in services, aligned with supporting our customers in achieving their sustainability goals, are likely to increase over the target period due to organic growth in these services.
19. In accordance with the GHG Protocol, we report our actual emissions for a specific reporting year and annualized emissions for our adjusted base year (accounting for mergers and acquisitions as described in Appendix C).

Endnotes

Appendix B

20. GHG emissions have been calculated based on the Greenhouse Gas Protocol, ISO 14064, and associated guidance. Scope 1, 2 emissions for all years as well as scope 3 emissions have been independently verified by a third-party. Landfill gas emissions are calculated using the US EPA Part 98, Subpart HH equations and associated guidance from SWICS. Scope 1, 2, and 3 GHG emissions have been recalculated for all reporting years using IPCC AR5 global warming potential values.
21. Our base year (2021) scope 1 emissions have been recalculated in accordance with the GHG Protocol to reflect structural changes including acquisitions and divestitures, changes in our calculation methodology to align with industry practices and certain accuracy improvements. GHG emissions reported for scope 1 and 2 represent actual emissions for the reporting year, not adjusted for acquisitions and divestitures. For example, acquisitions completed in 2023 are accounted for the portion of the year owned in 2023 and the full-year of ownership in 2024.
22. Mobile sources include on- and off-road vehicles and equipment from GFL's Solids and Environmental Services Divisions.
23. In accordance with the GHG Protocol, location-based emissions represent the use of regional grid-sourced electricity at GFL-owned facilities. Market-based emissions represent grid-sourced electricity at GFL-owned facilities bundled with regional renewable energy certificates (RECs).
24. 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.
25. GFL's Used Motor Oil Refinery collects used oil for re-refining. Used motor oil that is collected but not re-refined by us is sold as fuel into the burner fuel market. Emissions from the combustion of this sold fuel is accounted for as use of sold products.
26. Avoided emissions represent the potential emissions reductions associated with recycling materials. They are calculated using the US EPA's WARM tool and include emissions associated with recycling and processing materials compared to landfilling and replacing them with virgin inputs. Emissions downstream of GFL's recycling operations associated with processing recovered materials are not reported in GFL's scope 3 GHG inventory.
27. 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.
28. Avoided emissions per million dollars of sales does not include carbon sequestered in our landfills. This value is calculated by dividing the GHG emissions avoided through our recyclables, organics and other recyclable waste streams plus renewable energy generation from our landfills, by our total revenue in CAD.
29. The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (GHG Protocol), Revised Edition, March 2004, published by the World Resources Institute and the World Business Council on Sustainable Development (WRI/WBCSD). https://ghgprotocol.org/corporate-standard, .
30. SASB Standards (Now part of IFRS Foundation). Waste Management Sustainability Accounting Standard. Infrastructure Sector, Sustainable Industry Classification System (SICS) IF-WM. Version 2023-12.
31. Protocol for the quantification of greenhouse gas emissions from waste management activities published by Entreprises pour l'Environnement (EpE).
32. Environmental Protection Agency. 40CFR Part 98 – Mandatory Greenhouse Gas Reporting. Table A-1 to Subpart A of Part 98 – Global Warming Potentials.
33. Base year recalculation methodologies for structural changes, Appendix E to the GHG Protocol Corporate Accounting and Reporting Standard – Revised Edition. Version January 2005. Published by the World Business Council for Sustainable Development and the World Resources Institute (WRI/WBCSD).

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