

2024 GRI Content Index

Statement of use	GFL Environmental Inc. has reported the information cited in this GRI content index for the period 1 January 2024 to 31 December 2024 (unless noted otherwise) with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI 2 – GENERAL DISCLOSURES	
DISCLOSURE	LOCATION OR RESPONSE
2-1 Organizational details	GFL Environmental Inc.'s (GFL) headquarters are located at 100 New Park Place, Suite 500, Vaughan, ON, L4K 0H9, Canada. GFL is the fourth largest diversified environmental services company in North America, as measured by revenue and North American operating footprint. Our operations are located across all 10 Canadian provinces and half of the states in the United States. GFL is publicly traded on the Toronto and New York Stock Exchanges under the trading symbol "GFL". See pages 29-38 of GFL's 2024 Annual Report for additional information. In this Index, "we", "us", "our", "GFL" and the "Company" refer to GFL Environmental Inc. and all entities controlled by it unless the context otherwise requires.
2-2 Entities included in the organization's sustainability reporting	2024 Annual Report – pg. 29-31, Corporate Structure
2-3 Reporting period, frequency and contact point	Our reporting period is the 2024 calendar year unless otherwise noted. We report on an annual cycle. Comments and questions related to the information in this index can be directed to Investor Relations at ir@gflenv.com .
2-4 Restatements of information	Any restatements of information and associated reasons are identified within GFL's 2024 Sustainability Report , 2024 Climate Report and 2024 Data Summary Table . Changes to our disclosures to exclude information regarding our Environmental Services business, including the soil remediation sites and operations, that were sold effective March 1, 2025, will be reflected beginning with our reporting for the 2025 calendar year.
2-5 External assurance	Independent third-party verification of our 2024 scope 1, 2 and 3 greenhouse gas (GHG) emissions was completed in accordance with the ISO 14064-3 Standard
2-6 Activities, value chain and other business relationships	2024 Annual Report – pg. 29-47, Corporate Structure
2-7 Employees	2024 Data Summary Table – pg. 8-9
2-9 Governance structure and composition	Our 2025 Proxy Circular contains information about GFL's Board of Directors and its committees.
2-10 Nomination and selection of the highest governance body	2025 Proxy Circular – pg. 10-12, Proposal 1 – Election of Directors; pg. 56-59, Committees of our Board Nomination, Governance and Compensation Committee Charter Inclusion Policy Corporate Governance Guidelines
2-11 Chair of the highest governance body	2025 Proxy Circular – pg. 13 Mr. Patrick Dovigi is the Founder, President, CEO and Chairman of the Board of GFL.


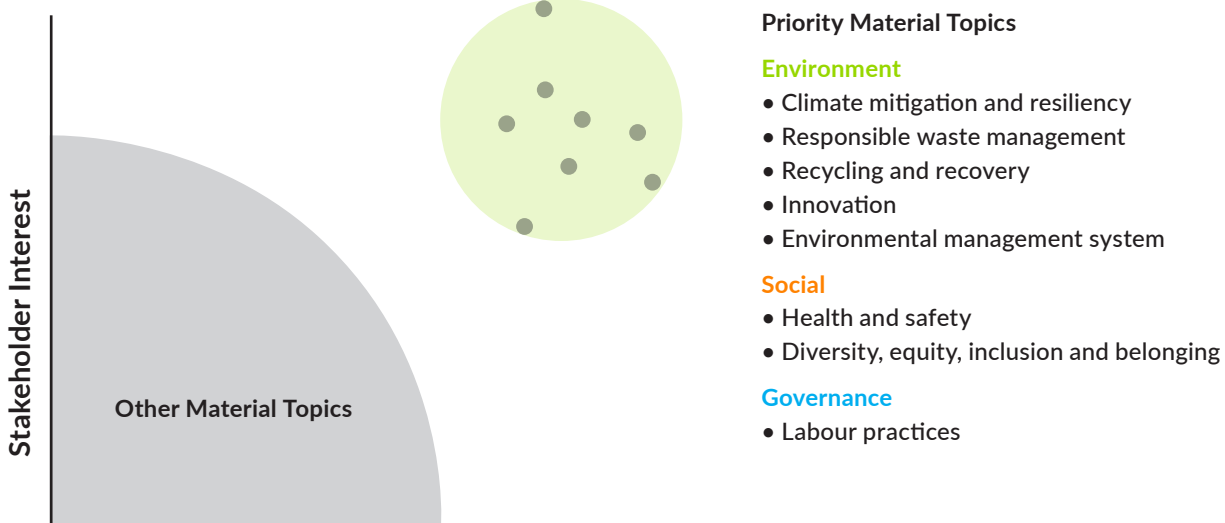
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GRI 2 - GENERAL DISCLOSURES	
DISCLOSURE	LOCATION OR RESPONSE
2-12 Role of the highest governance body in overseeing the management of impacts	<p>2025 Proxy Circular – pg. 56-59, Committees of our Board</p> <p>Board and Committee Charters</p> <p>2024 Climate Report – pg. 5-7, Section 3. Governance</p> <p>2025 CDP Response (for 2024 FY) – pg. 41-66, C4. Governance</p>
2-13 Delegation of responsibility for managing impacts	<p>2025 Proxy Circular – pg. A-2, Section 7 Delegations and Approval Authorities</p> <p>2024 Annual Report – pg. 63-66, Committees of our Board of Directors</p> <p>2024 Climate Report – pg. 5-7, Section 3. Governance</p> <p>2025 CDP Response (for 2024 FY) – pg. 41-66, C4. Governance</p>
2-14 Role of the highest governance body in sustainability reporting	<p>2025 Proxy Circular – pg. 59-60, Sustainability Matters</p> <p>2024 Annual Report – pg. 63-66, Committees of our Board of Directors</p> <p>2024 Climate Report – pg. 5-7, Section 3. Governance</p> <p>2025 CDP Response (for 2024 FY) – pg. 41-66, C4. Governance</p>
2-15 Conflicts of interest	<p>2025 Proxy Circular – pg. 50-51, Conflicts of Interest and Related Party Transactions</p> <p>Code of Ethics – pg. 3, Section 3.8 Conflicts of Interest</p> <p>Corporate Governance Guidelines – pg. 5, Section 10 Conflicts of Interest and Related Party Transactions</p> <p>2024 Annual Report – pg. 67, Conflicts of Interest</p> <p>Our Annual Report discloses identified conflicts of interest. To our knowledge, there are no existing or potentially material conflicts of interest between the Company or a subsidiary of the Company and any director or officer of the Company or of a subsidiary of the Company.</p>
2-16 Communication of critical concerns	<p>Audit Committee Charter</p> <p>As noted in disclosures above, the NGC Committee and Audit Committee are responsible for reporting to GFL’s Board. This includes reporting on potential and actual impacts on stakeholders raised through grievance mechanisms and other processes. GFL’s Whistleblower Policy includes a process for the anonymous reporting of complaints against the company. Our Board is updated on whistleblower complaints on a quarterly basis.</p>
2-17 Collective knowledge of the highest governance body	<p>2025 Proxy Circular – pg. 52, Skills Matrix; pg. 53-54, Orientation and Continuing Education</p>

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GRI 2 - GENERAL DISCLOSURES	
DISCLOSURE	LOCATION OR RESPONSE
2-18 Evaluation of the performance of the highest governance body	2025 Proxy Circular - pg. 57-59, Nomination, Governance and Compensation Committee Corporate Governance Guidelines - pg. 5, Section 11 Board Self-Assessment
2-19 Remuneration policies	2025 Proxy Circular - pg. 22-44, Proposal 3 - Advisory Vote on Executive Compensation
2-20 Process to determine remuneration	2025 Proxy Circular - pg. 22-44, Proposal 3 - Advisory Vote on Executive Compensation
2-22 Statement on sustainable development strategy	2024 Climate Report - pg. 4, Climate Strategy Sustainability Action Plan
2-23 Policy commitments	We believe that we have appropriate policies and processes in place that align with UNGC Principles and the OECD guidelines that ensure that we are conducting our business operations responsibly. GFL has adopted corporate governance policies that include our Human Rights Policy, Code of Ethics, Supplier Code of Conduct, Environmental Policy and Anti-Corruption Policy, as well as a Whistleblower Policy. Our processes include regular updates to our Board of Directors on any material incidents that may arise. Copies of our policies and more information regarding our governance practices are available on our website here .
2-24 Embedding policy commitments	GFL's Board is responsible for monitoring the implementation of procedures, policies and initiatives relating to corporate governance, risk management, corporate social responsibility, health and safety, ethics and integrity. The majority of our policies include provisions related to oversight and/or how the requirements of the policy are to be implemented in the organization. As we form or continue business relationships with our various partners, suppliers, contractors or other parties, we inform them of applicable policies (e.g. Supplier Code of Conduct) and any related obligations they may have. At the time of hire or onboarding, all GFL employees are required to review and acknowledge our corporate policies. Annually thereafter those employees with supervisory responsibilities (salaried and hourly) are required to re-acknowledge these policies.
2-26 Mechanisms for seeking advice and raising concerns	Code of Ethics Whistleblower Policy
2-27 Compliance with laws and regulations	2024 SASB Report - pg. 2-3
2-28 Membership associations	2024 Data Summary Table - pg. 10
2-29 Approach to stakeholder engagement	2025 CDP Response (for 2024 FY) - pg. 93-94, C5. Business Strategy 2024 Sustainability Report - pg. 22-24, Our Communities
2-30 Collective bargaining agreements	2024 Annual Report - pg. 37, Employees

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GRI 3 - MATERIAL TOPICS	
DISCLOSURE	LOCATION OR RESPONSE
<p>3-1 Process to determine material topics</p>	<p>In 2021 we undertook our first materiality assessment to ground our Sustainability Action Plan in what matters most to our business and our stakeholders, and to identify risks and opportunities in implementing our business strategy. In completing our materiality assessment, we considered the perspectives of our stakeholders including our employees, customers, and shareholders. The analysis also drew from desktop research and internal working sessions with our employees including our executive leadership. Our process for conducting materiality assessments is noted in the diagram below.</p> <p>Steps in Our Materiality Assessment</p>  <p>As we continue to implement the actions within our Sustainability Action Plan, we intend to review and update our materiality assessment as necessary to help inform our progress and identify new or emerging interests among our stakeholders as well as priorities for our business.</p>
<p>3-2 List of material topics</p>	<p>GFL Materiality Analysis</p>  <p>Priority Material Topics</p> <p>Environment</p> <ul style="list-style-type: none"> • Climate mitigation and resiliency • Responsible waste management • Recycling and recovery • Innovation • Environmental management system <p>Social</p> <ul style="list-style-type: none"> • Health and safety • Diversity, equity, inclusion and belonging <p>Governance</p> <ul style="list-style-type: none"> • Labour practices

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GRI 200 - ECONOMIC		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 201: Economic Performance	3-3 Management of Economic Performance	2025 Proxy Circular 2024 Annual Report – pg. 1 – 30, Management’s Discussion and Analysis of Financial Condition and Results of Operations
	201-1 Direct economic value generated and distributed	2024 Annual Report – pg. F1- F43, Consolidated Financial Statements for the year ended December 31, 2024
	201-2 Financial implications and other risks and opportunities due to climate change	2025 CDP Response (for 2024 FY) – pg. 28-40, Section C3. Disclosure of Risks and Opportunities
GRI 205: Anti-Corruption	3-3 Management of Anti-Corruption	Human Rights Policy Code of Ethics Supplier Code of Conduct Anti-Corruption Policy
	205-2 Communication and training about anti-corruption policies and procedures	At the time of hire or onboarding, all GFL employees are required to review and acknowledge our corporate policies including our anti-corruption policies and procedures. Annually thereafter those employees with supervisory responsibilities (salaried and hourly) are required to re-acknowledge these policies. The anti-corruption policies provide that violations must be reported pursuant to our Whistleblower Policy , and our Board is updated on whistleblower complaints on a quarterly basis. In addition, GFL’s Board annually reviews our corporate governance policies including our Anti-Corruption Policy . Our Supplier Code of Conduct also includes provisions to ensure conformance of our suppliers with our anti-corruption and anti-bribery policies.
	205-3 Confirmed incidents of corruption and actions taken	None.

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GRI 300 - ENVIRONMENTAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 302: Energy	3-3 Management of Energy	Environmental Policy 2024 Sustainability Report - pg.13-15 , Circular Economy and Climate Leadership 2024 Climate Report 2024 Data Summary Table - pg. 6.
	302-1 Energy consumption within the organization	2024 Data Summary Table - pg. 6.
	302-3 Energy intensity	2024 Data Summary Table - pg. 6.
GRI 303: Water and Effluents	3-3 Management of Water and Effluents	Environmental Policy 2024 Climate Report - pg. 12, Section 4. Evaluating our climate resilience To manage potential water-related impacts from landfill leachate and stormwater runoff, GFL ensures appropriate controls are in place through permits, the use of engineer-designed on-site treatment facilities, discharge to approved off-site treatment facilities, and regular monitoring. We also continue to improve the tracking and measurement of our water usage as we integrate the collection of this data through our utility bill management system. In 2024, we hired a Director of Wastewater Treatment to oversee the development of our leachate management program.
	303-1 Interactions with water as a shared resource	In general, GFL's water usage is minimal and primarily related to supporting our operations for uses such as truck washing, rinsing, dust control, and odor management, as well as domestic needs like drinking water, sanitation, and landscaping. Water is primarily sourced from municipal water services. Some of our sites also use stormwater from on-site stormwater management ponds for dust control. Small amounts of water may also be withdrawn from supply wells at specific GFL sites. The majority of wastewater generated by our operations is leachate generated at our landfill sites. Landfill leachate is created by precipitation and other liquids percolating through a landfill. Technologies currently in use at some of our sites to manage and treat leachate include reverse osmosis, aerobic biological oxidation, chemical oxidation, and adsorption media to help remove various compounds. We are currently in the planning stages to construct onsite treatment facilities at eight additional sites over the next three to five years. We also continue to explore the use of new treatment technologies for emerging contaminants of concern.
	303-2 Management of water discharge-related impacts	For our facilities that have discharge permits or approvals, effluent is monitored for applicable effluent parameters and reported to regulators in accordance with regulatory requirements.

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GRI 300 - ENVIRONMENTAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 304: Biodiversity	3-3 Management of Biodiversity	Environmental Policy 2024 Sustainability Report - pg. 25, Our Communities
	304-2 Significant impacts of activities, products, and services on biodiversity	GFL's portfolio of assets across North America includes more than 90 landfills. Landfills are most often located (at least when originally constructed) in areas that are more rural. Before a landfill site can be developed or expanded, the proposed development is required to conduct an environmental assessment which includes an assessment of the potential impacts on biodiversity-sensitive areas. If such areas are identified in the environmental assessment, the permits issued for the development and operation of the landfill will, if deemed appropriate by the regulator, include measures required to be taken to mitigate the impacts of the landfill development and operations on such biodiversity-sensitive areas and GFL complies with these requirements.
	304-3 Habitats protected or restored	As part of our commitment to promote and conserve biodiversity, our Sustainability Action Plan includes our commitment to certify conservation or protection projects at least 10 of our facilities by 2025. For additional information on this commitment, please see page 25 of our 2024 Sustainability Report .
GRI 305: Emissions	3-3 Management of Emissions	Environmental Policy 2024 Sustainability Report - pg. 14-15, Circular Economy and Climate Leadership 2024 Climate Report 2025 CDP Response (for 2024 FY) - pg. 101-184, C7. Environmental performance - Climate Change 2024 Data Summary Table - pg. 3-5
	305-1 Direct (Scope 1) GHG emissions	<p>Direct (scope 1) GHG emissions data for 2021 to 2024 are provided in GFL's 2024 Data Summary Table. Additional information on the breakdown of our scope 1 emissions is also found in Section C7 of our 2025 CDP Response (for 2024 FY).</p> <p>Information on the emission sources included within our inventory and our GHG accounting approach can be found within our 2024 Climate Report, pg. 27-29, Appendix B - GHG emissions and accounting approach. Progress on our scope 1 and 2 GHG emission reduction target is also described in the 2024 Climate Report.</p> <p>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. Independent third-party verification of our 2024 scope 1, 2 and 3 greenhouse gas (GHG) emissions was completed in accordance with the ISO 14064-3 Standard.</p>
	305-2 Energy indirect (Scope 2) GHG emissions	<p>Indirect (scope 2) GHG emissions data for 2021 to 2024 are provided in GFL's 2024 Data Summary Table. Additional information on the breakdown of our scope 2 emissions is also found in Section C7 of our 2025 CDP Response (for 2024 FY).</p> <p>Information on the emission sources included within our inventory and our GHG accounting approach can be found within our 2024 Climate Report, pg. 27-29, Appendix B - GHG emissions and accounting approach. Progress on our scope 1 and 2 GHG emission reduction target is also described in the 2024 Climate Report.</p> <p>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. Independent third-party verification of our 2024 scope 1, 2 and 3 greenhouse gas (GHG) emissions was completed in accordance with the ISO 14064-3 Standard.</p>

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GRI 300 - ENVIRONMENTAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 305: Emissions - <i>continued</i>	305-3 Other indirect (Scope 3) GHG emissions	<p>Indirect (scope 3) GHG emissions data for the 2021 to 2024 reporting years are provided in GFL's 2024 Data Summary Table. Additional information on the breakdown of our scope 3 emissions is also found in Section C7 of our 2025 CDP Response (for 2024 FY).</p> <p>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. Independent third-party verification of our 2024 scope 1, 2 and 3 greenhouse gas (GHG) emissions was completed in accordance with the ISO 14064-3 Standard.</p>
	305-4 GHG emissions intensity	<p>Carbon intensity figures for both avoided and emitted GHGs for 2021 to 2024, are provided in GFL's 2024 Data Summary Table.</p> <p>A discussion of our emission intensity is provided in GFL's 2025 CDP Response (for 2024 FY) - pg.159 -160, C.7 Environmental performance - Climate Change, Section C7.45.</p>
	305-5 Reduction of GHG emissions	<p>2024 Data Summary Table - pg. 5.</p> <p>2024 Sustainability Report - pg. 14-15, Circular Economy and Climate Leadership</p> <p>2024 Climate Report - pg. 18-22, Section 6. Metrics and targets</p> <p>2025 CDP Response (for 2024 FY) - pg. 101-184, C7. Environmental performance - Climate Change</p>
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	<p>2024 Data Summary Table - pg. 6.</p> <p>2024 SASB Report - pg. 2</p>

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GRI 300 - ENVIRONMENTAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 306: Waste	3-3 Management of Material Topics: Waste	Environmental Policy 2024 Sustainability Report - pg. 10-15, Circular Economy and Climate Leadership 2024 Annual Report - pg. 34-36, Our Operations GFL is in the business of the collection, consolidation, management, transportation, processing and disposal of both hazardous and non-hazardous solid and liquid waste materials that are generated by our customers. We generate a nominal volume of solid waste in our own operations which includes a low volume of hazardous waste primarily related to our fleet operations. 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.
	306-2 Waste generation and significant waste-related impacts	2024 SASB Report - page 3
	306-3 Waste generated	1,569 tonnes Total waste generated by our employees includes amounts from sources such as waste from lunchrooms, print rooms, offices etc. At this time, the company-wide figure is extrapolated from the results of waste audits conducted at our corporate headquarters in Vaughan, Ontario, and published estimated solid waste generation rates from the Washington State Department of Ecology.
	306-4 Waste diverted from disposal	387 tonnes Total waste diverted from disposal by our employees includes amounts from sources such as waste from lunchrooms, print rooms, offices etc. At this time, the company-wide figure is extrapolated from the results of waste audits conducted at our corporate headquarters in Vaughan, Ontario, and published estimated solid waste generation rates from the Washington State Department of Ecology.

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GRI 400 - SOCIAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 401: Employment	3-3 Management of Employment	Human Rights Policy Code of Ethics 2024 Sustainability Report - pg. 19-20, Team Green
	401-1 New employee hires and employee turnover	2024 Data Summary Table - pg. 7
	401-3 Parental leave	GFL's employee benefits program includes a Maternity/Paternal Leave Top-Up Program (for both our Canadian and U.S. workforce).
GRI 403: Occupational Health and Safety	3-3 Management of Occupational Health and Safety	Safe For Life Program Description 2024 Sustainability Report - pg. 18, Team Green Health and Safety Policy
	403-1 Occupational health and safety management system	Safe For Life Program Description Health and Safety Policy
	403-2 Hazard identification, risk assessment, and incident investigation	Safe For Life Program Description Health and Safety Policy
	403-3 Occupational health services	Safe For Life Program Description Health and Safety Policy Through GFL's Corporate Health and Safety Policy we formally commit to recognizing all of our employees' rights under applicable health and safety legislation including requirements that we maintain the confidentiality of our employees' personal health-related information.
	403-4 Worker participation, consultation, and communication on occupational health and safety	Safe For Life Program Description Health and Safety Policy In addition to engaging and consulting with employees through our Safe For Life program, GFL follows all applicable regulatory requirements for creating and maintaining joint health and safety committees.
	403-5 Worker training on occupational health and safety	Safe For Life Program Description Health and Safety Policy

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GRI 400 – SOCIAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 403: Occupational Health and Safety - <i>continued</i>	403-6 Promotion of worker health	Beyond providing a comprehensive health benefits package, GFL also has in place an Employee Assistance Program that provides a range of confidential services to help employees manage personal difficulties and life situations. GFL's signature Greenleaf Scholars Program and Green Futures Employee Scholarship provide financial support and expanded opportunities for our employees and their families to access higher education. We also completed our first employee experience survey in 2024.
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Through our Supplier Code of Conduct , we require that all of our suppliers are committed to ensuring environmental compliance, reducing consumption of scarce resources, and managing waste streams in an environmentally responsible manner. We also require that our suppliers operate their businesses in a manner that is aligned with our Code of Ethics. As part of our Sustainability Action Plan, we are committed to completing sustainability supply chain management audits for 100 of our critical tier 1 suppliers by 2025 to ensure our continued alignment.
	403-8 Workers covered by an occupational health and safety management system	Health and Safety Policy
	403-9 Work-related injuries	2024 Data Summary Table – pg. 9
GRI 404: Training and Education	3-3 Management of Training and Education	2024 Annual Report – pg. 37, Employees 2024 Sustainability Report – pg. 20, Team Green We are invested in building and maintaining a varied and broad workforce and leadership team. We are implementing programs to encourage employee engagement and to support employee training and development within GFL. We continue to prioritize investing in human capital management, including through mentorship programs.
	404-2 Programs for upgrading employee skills and transition assistance programs	2024 Sustainability Report – pg. 20, Team Green
GRI 405: Diversity and Equal Opportunity	3-3 Management of Diversity and Equal Opportunity	Human Rights Policy Code of Ethics 2024 Sustainability Report – pg. 19, Team Green
	405-1 Diversity of governance bodies and employees	2025 Proxy Circular – pg. 13-18, Description of Proposed Director Nominees 2024 Data Summary Table – pg. 8

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GRI 400 - SOCIAL		
DISCLOSURE	DISCLOSURE TITLE	LOCATION OR RESPONSE
GRI 413: Local Communities	3-3 Management of Local Communities	Human Rights Policy Environmental Policy 2024 Sustainability Report - pg. 22-24, Our Communities
	413-1 Operations with local community engagement, impact assessments, and development programs	2024 Sustainability Report - pg. 22-24, Our Communities 2024 Data Summary Table - pg. 10 Through our Full Circle Project Charitable Giving Program, GFL provided \$4.2 million in charitable donations to communities we serve in 2024.
GRI 415: Public Policy	3-3 Management of Public Policy	Corporate Governance Guidelines Code of Ethics 2025 CDP Response (for 2024 FY) - pg. 52-53, C4. Governance
	415-1 Political contributions	2024 Data Summary Table - pg. 10 Our 2024 Data Summary Table provides information on the primary organizations we are members of or work with to further waste management policy within the jurisdictions we operate and other waste-related initiatives.

