



Human Rights Policy



POLICY

GFL Environmental is built on a foundation of respect for human rights and a commitment to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible and ethical operations. This human rights policy reflects the commitment of GFL Environmental Inc. and its subsidiaries (collectively, "GFL") to protect and advance human rights in GFL's business practices.

This policy is guided by the international human rights principles encompassed by the Universal Declaration of Human Rights, and those contained within the International Bill of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

SCOPE

This policy applies to all personnel who are employed by or engaged to provide services to GFL, including GFL's employees, officers and members of the Board of Directors. We also expect our independent contractors and suppliers to share our commitment and standards by adopting similar policies and upholding these values within their business operations. Our Supplier Code of Conduct reinforces and clarifies this commitment. Under that Code of Conduct, GFL reserves the right to conduct audits to verify that our suppliers are honouring this commitment.

GFL's respect for human rights is demonstrated by our commitment to the 10 Principles set out in this Policy. Actions and procedures to implement this policy include awareness and training of employees, contract language where applicable, a Whistleblower Policy to encourage anonymous reporting of ethical concerns or breaches of this policy or any other policy of GFL including our Code of Conduct, as well as through regular review.

PRINCIPLES

1. Diversity and Inclusion

We are committed to fostering workplaces that are diverse and inclusive and in which all individuals are treated with dignity and respect. Our Women in Waste program is evidence of this commitment and seeks to encourage women's advancement in GFL and to attract and retain women to non-traditional roles within GFL. We are committed to maintaining a workplace that is free from discrimination or harassment on the basis of age, color, creed, disability, ethnic origin, gender (including pregnancy, childbirth or related medical conditions), marital status, national origin, political belief, race, religion, sexual orientation, gender identity, gender expression, genetic information, military or veteran status, citizenship status, or any other characteristics protected by law and ensuring that employment decisions are made solely based on qualifications, abilities and performance and without regard to any of the above prohibited factors.

2. Equal Opportunity

All hiring and employment related decisions, including those related to recruitment, placement, development, training, compensation and advancement are based solely on the worker's qualifications, performance, skills and experience. We also make reasonable accommodations for qualified employees or applicants with a disability (as defined by applicable laws) as well as our employees' religious beliefs. We will not tolerate unlawful discrimination with respect to any employment-related decision or practice.

3. Freedom of Association and Collective Bargaining

In accordance with applicable labour laws, we respect the right of our employees to join, form, or not to join a labor union and to bargain collectively through employees' freely chosen representatives, without fear of reprisal, intimidation or harassment. Where employees are

represented by a legally recognized union, we are committed to bargaining in good faith with such representatives.

4. Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. We are committed to providing a safe and healthy workplace in compliance with all applicable health and safety laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace by addressing and remediating identified risks of accidents, injury and health impacts.

5. Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

6. Forced Labor, Human trafficking and Child Labor

We prohibit the use of all forms of forced labour, child labour, and any form of human trafficking or slavery. We further prohibit the hiring of individuals that are below the age of majority, as defined by applicable law, for positions involving potentially hazardous work.

7. Working hours, wages and benefits

We compensate employees competitively, relative to the industry and local labour market conditions and in accordance with terms of any applicable collective bargaining agreements. We are committed to ensuring that we operate in full compliance with applicable wage, work hours, overtime and benefits laws and to providing competitive health, welfare and retirement benefits in order to attract and maintain our workforce.

8. Environmental Responsibility

We are committed to the protection of the environment and continual improvement. We seek to reduce GFL's environmental footprint in our operations and provide accessible, cost-effective and sustainable solutions to our customers. Our commitment to environmental responsibility is evidenced by GFL's Environmental Policy, which outlines our commitment to environmental stewardship in the communities we live in and serve.

9. Community and Stakeholder Engagement

We recognize that we are part of the communities in which we operate. We seek opportunities to work with our employees, contractors and suppliers to develop and increase our shared understanding of human rights and improve our collective performance in delivering on the principles outlined in this policy. GFL is also committed to enhancing our communities through charitable giving. Among our charitable giving projects, GFL's Full Circle Project allows our customers to decide how a portion of our charitable donations are best directed so as to positively impact their local communities. We also encourage the volunteer activities of our employees in the communities in which they live and work along with charitable donations made by GFL to charities in our communities.

10. Reporting

We strive to create a workplace in which open and honest communications among all employees are valued and respected. GFL is committed to complying with all applicable laws wherever we operate. Any employee who believes that a conflict arises between the language of this policy and the laws, customs and practices of their workplace, has questions about this policy, or would like to confidentially report a potential violation of this policy, can anonymously raise those questions

and concerns by telephone at 1(844) 649-6984, or otherwise in accordance with GFL's Whistleblower Policy. In unionized workplaces, employees also may raise grievances regarding certain workplace issues including violations of this policy in accordance with applicable grievance procedures. GFL will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any confirmed violation. No reprisal or retaliatory action will be taken against any employee for acting in good faith in raising concerns under this policy or participating in an investigation into a complaint made under this policy.

MANAGEMENT, COMPLIANCE AND AUDITING

Management of this policy is the responsibility of the Chief Executive Officer and GFL's Chief Legal Officer. The Board of Directors maintains general oversight of this policy.

GFL reserves the right to audit and request records, documents and other information to verify that business is being conducted in compliance with this policy. All GFL employees and third parties through whom GFL conducts business are required to fully, accurately and promptly cooperate with any such investigation or audit.

Disciplinary action, up to and including termination, subject to applicable law may result from any violation of this policy. In addition, responsible individuals may be subject to criminal prosecution if applicable laws are violated.

GFL reserves the right to amend this policy at any time. This policy is not intended and does not constitute or create contractual terms of employment.