



GFL Environmental Inc. MODERN SLAVERY ACT ANNUAL REPORT

Introduction

This report is published under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") on behalf of GFL Environmental Inc. and GFL Environmental Services Inc. (together, "**GFL**", "**we**", "**our**", "**us**" and the "**Company**"). This report covers our 2024 fiscal year, being the year ended December 31, 2024. GFL Environmental Services Inc. was a wholly-owned subsidiary of GFL Environmental Inc. for the 2024 fiscal year. We are subject to the reporting requirements of the Act based on limited importing activities conducted in connection with the purchase of supplies for our Canadian operations as described in greater detail below. For fiscal 2024, within Canada we also sold products that we recovered from our operations, including organics, commodities and processed oil. We do not consider these products to be "goods" for purposes of the Act.

GFL is committed to acting with integrity and ethically in all of our business transactions. This includes working collaboratively with our suppliers to identify and reduce the risk of forced labour or child labour occurring within our supply chain network. GFL expects suppliers and business partners to uphold these same principles within their operations and to comply with all applicable laws, including human rights and employment standards laws.

Our structure, operations and supply chains

GFL Environmental Inc. was incorporated under the Ontario *Business Corporations Act* on December 19, 2007. GFL Environmental Services Inc. was formed under the Ontario *Business Corporations Act* on October 1, 2021. Our registered and head office is located at 100 New Park Place, Suite 500, Vaughan, Ontario. GFL Environmental Inc.'s subordinate voting shares trade on the Toronto Stock Exchange and the New York Stock Exchange.

GFL is the fourth largest environmental services company in North America. For fiscal 2024, our diversified offerings consisted of solid waste management, liquid waste management and soil remediation services, including collection, transportation, transfer, recycling and disposal services for municipal, residential, and commercial and industrial customers. We operate in Canada and the United States. In Canada, we were supported by a team of over 10,000 employees as of December 31, 2024.

In connection with our operations across Canada, we purchase a variety of supplies primarily from Canadian suppliers. From time to time we may import supplies into Canada, substantially all of which come from the United States. Imported supplies include, among other things, machinery, equipment, parts and tools. The value of supplies imported into Canada by GFL is immaterial relative to the Company's overall supplier expenses.

Our policies and due diligence processes

GFL is built on a foundation of respect for human rights and a commitment to protect and advance human rights in our business practices. Our relevant policies and due diligence and training processes are described below.

Human Rights Policy

We maintain a comprehensive Human Rights Policy which sets out our commitment to treating all workers with respect and dignity, ensuring safe working conditions and conducting environmentally responsible and ethical operations.

The Human Rights Policy sets out the following principles we are committed to with respect to human rights:

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- inclusion and belonging;
 - equal opportunity;
 - freedom of association and collective bargaining;
 - safe and healthy workplaces;
 - maintaining workplaces free from violence, harassment and intimidation;
 - prevention of forced labour, human trafficking and child labour;
 - supply chain transparency;
 - compliance with working hours, wages and benefits laws;
 - environmental responsibility;
 - community and stakeholder engagement; and
 - open and honest communication with respect to reporting violations of our policies or applicable laws or other concerns.

Supplier Code of Conduct

Our Supplier Code of Conduct sets out our expectation that our suppliers demonstrate a similar commitment to their employees, and accordingly we expect our suppliers to adopt similar policies, upholding these values and adhering to applicable human rights and employment standards laws within their business operations.

Our Supplier Code of Conduct provides that suppliers must manage their own operations to achieve the following results with respect to labour and human rights:

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- all work must be freely chosen and forced labour, human trafficking and modern slavery are strictly prohibited;
 - workers must be provided with all legally mandated wages and benefits, and suppliers must comply with all applicable overtime, rest period and maximum working hours rules;
 - suppliers will not use child labour or employ individuals in violation of any applicable minimum age laws or regulations;
 - workers must be permitted to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment; and
 - workplaces must be professional and inclusive, promote equal opportunities and be free of harassment and discriminatory practices.

The Supplier Code of Conduct also sets out our expectations with respect to health and safety, environmental practices and ethical business activities.

Suppliers are required to promptly report to us on any known or suspected violations of the Supplier Code of Conduct.

Code of Ethics

We have adopted a Code of Ethics which applies to all our officers, directors, employees, contractors and agents acting on behalf of us. The objective of the Code of Ethics is to provide guidelines for maintaining our integrity, trust and respect. The Code of Ethics addresses compliance with laws, rules and regulations, conflicts of interest, confidentiality, preferential treatment, internal controls and disclosure, protection and proper use of our assets, communications, fair dealing, fair competition, due diligence, illegal payments, equal employment opportunities and harassment, privacy, use of Company computers and the internet, political and charitable activities and reporting any violations of law, regulation or the Code of Ethics.

Whistleblower Policy

We maintain a Whistleblower Policy which addresses procedures governing complaints by directors, officers, employees and third parties with respect to the Company. Complaints may relate to, among other things, accounting, internal controls, auditing matters, violations of laws or the Code of Ethics and any other concerns regarding behavior or conduct that may be considered unethical, suspicious, fraudulent or illegal.

We also maintain a third-party managed confidential reporting platform that permits the reporting of complaints in accordance with the Whistleblower Policy, including on an anonymous basis. Our Board of Directors (the “**Board**”) is updated on all complaints made under the Whistleblower Policy on at least a quarterly basis.

Our Human Rights Policy, Supplier Code of Conduct, Code of Ethics and Whistleblower Policy can be accessed on our website [here](#).

Training

At the time of hire or onboarding and on an annual basis thereafter, all GFL employees are required to review and acknowledge our corporate policies, including the Human Rights Policy, Code of Ethics and Whistleblower Policy.

Governance Framework

Our Board is responsible for supervising the management of the business and affairs of GFL, and our Audit Committee assists the Board in fulfilling its oversight responsibility with respect to enterprise risk management. We have also formed a Risk Management Steering Committee which oversees the implementation of our enterprise risk management system, including all of our operational, financial, strategic, reputational, employee, health and safety, legal and regulatory, information technology and sustainability-related risks and opportunities. The Risk Management Steering Committee reports to the Audit Committee on the implementation and management of our enterprise risk management system.

Risk of forced labour or child labour in our supply chains and remediation

We have concluded that our supply chains carry a low risk of forced labour or child labour. We have not identified (a) any forced or child labour in our supply chains or (b) any loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our supply chains. Accordingly, we did not take any corresponding remedial measures in fiscal 2024.

Steps taken to prevent and reduce the risk of forced labour or child labour

In fiscal 2024, we took the following steps to prevent and reduce the risk of forced labour or child labour in our supply chains:

- reviewed our Supplier Code of Conduct to ensure compliance with regulatory requirements and best practices;
- expanded our supply chain audit program and audited additional suppliers for, among other things, employee health and safety, human rights and sustainability practices;
- increased the use of our third-party supply chain monitoring system to monitor more suppliers for activities that could violate our Supplier Code of Conduct or cause us reputational damage;
- updated forms of supplier contracts across our organization to refer to and specifically require compliance with our Supplier Code of Conduct;
- expanded the role of the Company's centralized corporate procurement function in local contracting decisions to foster compliance with the Company's policies; and
- continued to distribute educational materials about our Whistleblower Policy and confidential reporting platform to employees throughout our operations.

Assessing our effectiveness

As described above, we conduct ongoing screening of suppliers to identify activities that could violate our Supplier Code of Conduct, and in fiscal 2024 we continued to expand our supply chain audit program. We intend to ensure that any issues identified through our due diligence processes are resolved in conformity with the principles of our Supplier Code of Conduct and other corporate policies, including terminating supplier relationships if appropriate.

Approval and attestation

This report was approved pursuant to section 11(4)(b)(i) by the boards of directors of GFL Environmental Inc. and GFL Environmental Services Inc. on April 30, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Patrick Dovigi
Founder, President and Chief Executive Officer
Date: May 31, 2025