

# ENVIRONMENTAL JUSTICE



## Definition of Environmental Justice

The EPA defines Environmental Justice (“EJ”) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. At Waste Connections, our approach to community engagement and support has always been consistent with EJ and integral to our operating philosophy. Further, our facilities are designed and operated to ensure the protection of the environment and to minimize potential impacts to nearby residents.

## Our Approach to Environmental Justice

We operate through a network of over 550 non-hazardous solid waste collection and post-collection facilities located across a diverse set of communities in 43 states in the U.S. and six provinces in Canada. Our operations safely collect and handle the waste generated by communities. By doing this, we support the local health and well-being and consider ourselves as members of the communities we have the privilege to serve. In fact, our operations are frequently major employers in our communities. We provide a variety of local job opportunities including but not limited to frontline drivers, skilled mechanics, operations managers, customer service representatives and financial controllers. Many of our local leaders and frontline employees live where they work, and make local concerns a priority through their direct involvement.

EJ consideration begins with the siting and development of our facilities, which require extensive regulatory reviews and include opportunities for local input and consideration. We work with communities to address concerns through the siting and design process, and we remain engaged after that process is completed.

Our operating permits may require mitigation of issues or impose operating restrictions to address changes in traffic patterns, the potential for odors, hours of operations, or other concerns. We also have vigorous internal processes in place to ensure compliance with regulations and work to minimize community impacts. We complement these efforts with extensive community outreach. In many cases, we have host community agreements, which provide for direct payments or other benefits to the host community. Often, we establish community groups that meet routinely to discuss activities at our facilities and any concerns from the group.

We share the EPA’s view regarding fair treatment. Therefore, we are committed to understanding the local impact of our facilities, specifically as it pertains to EJ. As such, we have used the EPA’s tools for evaluating the likelihood of disproportionate impact and determined that the vast majority of our operating locations would not be considered to be located in “at risk” communities. That said, we continue to evaluate impacts and work with communities to address their concerns, approaching EJ as an integral part of our role as an environmental services provider. Along with our analysis utilizing the EPA’s EJScreen, we may work with local, third party consultants to help frame EJ risks, and, where necessary, could aid in engagement planning with the community on key areas such as permit renewals, expansions, acquisitions, or new facilities.

## Board Oversight

Our Board of Directors has oversight of our efforts related to EJ and receives periodic updates from our EVP – Engineering and Disposal and VP – Engineering and Sustainability. Those updates include discussion of our analysis regarding EJ impacted areas and the steps we are taking to address local concerns.

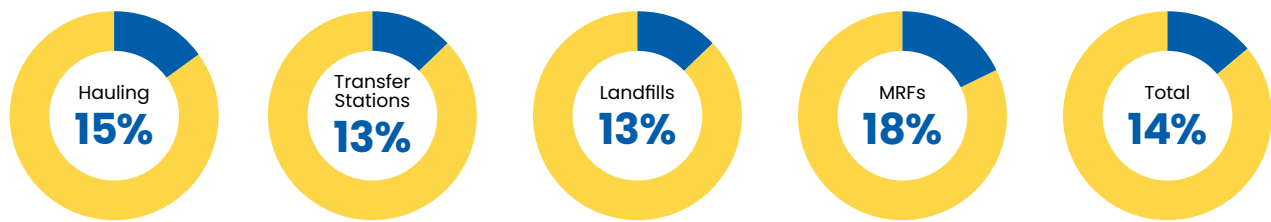
## Methodology and Findings

We utilize several methods to assess our company assets – informing our understanding of our impacts on local communities as well as potential regulatory risk to permitting and ongoing operations. As part of our assessment, we utilize the EPA’s EJScreen to evaluate the socioeconomic attributes of our operating locations in the U.S. First, we utilized the EJScreen’s “Demographic Index”

or “DI” that incorporates both race and income statistics throughout each census tract. We focused our analysis to the 80th percentile of the DI, above which census blocks are flagged for excessive EJ risk.

**Based on the EPA’s criteria for determining disproportionate impact, only 14% of our locations in the U.S. exceed the 80th percentile of the DI and are located in communities with excessive EJ risk.**

**EXHIBIT 1: PERCENTAGE OF U.S. FACILITIES THAT EXCEEDED THE 80TH PERCENTILE OF THE DEMOGRAPHIC INDEX\***



\*Utilizes the EJScreen for U.S. facilities with the charts above showing the percentage of locations that exceeded the 80th percentile of the DI, a level perceived by the EPA to have excessive EJ risk.

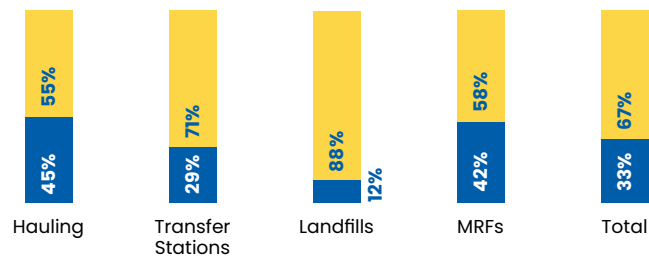
Second, in order to expand our efforts and analyze a closer proximity to our facilities, we utilized a one-kilometer radius around our operations to ensure those closest to our operations are represented within the EJScreen tool. We then compared these results to state averages for both race and income representation in order to reflect the relative socioeconomic attributes of the communities in which we operate.

**Based on EJScreen’s results for the racial percentages of residents in a one – kilometer radius of our facilities and compared to state averages, only 33% of our facilities are located in areas with higher ethnic minority representation, including only 12% of our landfills.**

**EXHIBIT 2: U.S. FACILITY DISTRIBUTION RELATIVE TO MINORITY POPULATION \*\***

### Minority Breakdown of Operating Sites

- % facilities within minority communities
- % facilities not in minority communities



\*\*Utilizes a 1-kilometer radius from our facilities and compares minority population to the respective state average to determine distribution.

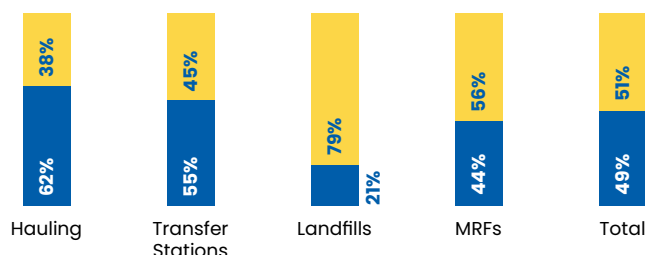
Based on EJScreen’s results for the low-income percentages of residents in a one-kilometer radius of our facilities, 49% of our total U.S. facilities are located

in markets that are below the state average for low-income, including only 21% for our landfills.

EXHIBIT 3: U.S. FACILITY DISTRIBUTION RELATIVE TO LOW-INCOME POPULATION \*\*\*

### Income Breakdown of Operating Sites

■ % facilities in low-income communities  
 ■ % facilities not in low-income communities



\*\*\*Utilizes a one-kilometer radius from our facilities and compares income characteristics to the respective state average to determine distribution.

## Operating in At Risk Communities

At many of our operating sites that we have determined to be within an EJ impacted area, we have a heightened focus on community engagement. Our focus is on understanding community characteristics, emphasizing open engagement with local stakeholders to align key interests and applying sound operating practices at our sites to maintain health and safety. Further, we aim to increase accessibility and communication by encouraging public site tours and hosting additional community meetings. We also ensure transparency by providing local air emissions reports, landfill gas monitoring reports and other environmental compliance reports in order to instill confidence in the local community that we are demonstrating our commitment to environmental stewardship.

## Indigenous Relations within Canadian Operations

We also operate facilities in Canada and strive to achieve positive community relations through active outreach programs, environmental stewardship and shared economic opportunities. In Canada, engagement with Indigenous communities is an integral component to the siting, development, expansion and ongoing operating process.

As it pertains to our EJ analysis and overall understanding of impact on local communities, we do not operate any Canadian facilities on Reserve Lands (as defined by the federal Indian Act) that could face the highest regulatory or operating scrutiny. Although we operate entirely outside of Reserve Lands, when developing or expanding an operating site, we actively consult local First Nation communities as part of the permitting process. We prioritize early engagement with Indigenous communities and, where possible, incorporate feedback in the regulatory review of new projects and developments in order to align with Indigenous interests. Further, we have established strong relationships by providing economic benefits for Indigenous communities through employment opportunities and utilization of Indigenous-owned businesses.