

# SUSTAINABILITY

@ CLEAN HARBORS



# Contents

## Overview

|                                     |   |
|-------------------------------------|---|
| Letter to our Stakeholders          | 3 |
| At a Glance                         | 4 |
| Our Vision, Mission and Core Values | 5 |
| Our History                         | 6 |
| Our Handprint on the Earth          | 7 |
| Stakeholder Dialogue                | 8 |
| Sustainability and Clean Harbors    | 9 |

## Environmental

|                                |    |
|--------------------------------|----|
| Greenhouse Gas Emissions       | 11 |
| Net Climate Benefit Factor     | 12 |
| Fleet                          | 13 |
| Fuel Consumption               | 15 |
| Air Emissions                  | 16 |
| Recycle and Reusable Resources | 17 |

## Social

|                           |    |
|---------------------------|----|
| Our People                | 21 |
| Health and Safety         | 22 |
| COVID Support             | 23 |
| Diversity and Inclusion   | 24 |
| Human Rights              | 26 |
| Development and Training  | 27 |
| Compensation and Benefits | 28 |
| Our Community             | 29 |

## Governance

|                               |    |
|-------------------------------|----|
| Corporate Governance          | 32 |
| Sustainability Governance     | 33 |
| Compliance and Ethics         | 34 |
| IT Security and Cybersecurity | 35 |

## Outlook

|                           |    |
|---------------------------|----|
| 2030 Goals and Benchmarks | 36 |
|---------------------------|----|

## Appendix

|                  |    |
|------------------|----|
| SASB Disclosures | 37 |
|------------------|----|



## Overview

### Dear Stakeholders:

---

Companies today are increasingly examining how they can better run their organizations in a more sustainable manner for the good of the planet and all of its people. At Clean Harbors, we celebrated our 40th anniversary in 2020 and our focus on environmental, social and governance (ESG) issues and sustainability has never been higher. As a good corporate citizen with more than 14,000 employees who care deeply about the environment, we believe in our ability to make a positive difference in the world through our operational handprint. This appreciation impacts how we conduct business, support our customers and strive to improve the communities we operate in.

Sustainability has been a part of our company's DNA since our founding in 1980. Protecting the environment is central to our identity and that's why sustainable business practices continue to play a key role in our organization. One of our underlying objectives as a company is to create a positive long-term legacy through sustainability. We don't view ESG as a set of metrics we simply need to report, but as an opportunity to demonstrate the difference our company makes in the work we do and the essential services we provide to our more than 300,000 customers.

With that in mind, we have created our inaugural Corporate Sustainability Report. This document was created using the framework of the Sustainability Accounting Standards Board (SASB). Our ESG initiatives – whether destroying ozone-depleting substances or investing in the health, vitality and diversity of our workforce – are helping us become a stronger and more purposeful organization. We believe each of these initiatives are aligned with our focus on financial performance, as we again delivered strong results in 2020.

We are incredibly proud of the work that we are doing. The solutions we provide customers makes us a positive force for sustainability and environmental progress. We look forward to sharing more about our ESG journey and the impact it generates in the years ahead.



**Alan S. McKim**  
*Chairman, President and CEO*  
Clean Harbors, Inc.



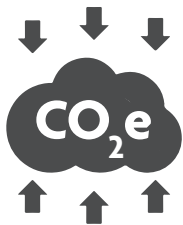
## Overview

### At a Glance


Over their lifetime our re-refineries have re-refined more than  
 **3.9 billion**  
 GALLONS OF USED OIL


Destroyed more than  
 **2 million**  
 lbs of ozone-depleting substances (ODS)<sup>1</sup>

# E




**3.5 million**  
 METRIC TONS  
 OF GREENHOUSE GAS  
 EMISSIONS AVOIDED<sup>1</sup>

 **2,018** MWh  
 GENERATED ANNUALLY FROM  
 SOLAR PANELS ON COMPANY PROPERTY

COLLECTED  
 **235** MILLION  
 GALLONS  
 OF USED OIL<sup>1</sup>

**6.8 million**  
 GALLONS OF SOLVENT  
 RECYCLED ANNUALLY



 **1.4 million**  
 METRIC TONS OF WASTE RECYCLED<sup>1</sup>

# S



**1.15**  
 Total Recordable  
 Incident Rate (TRIR)<sup>2</sup>

**8.3 years** Average Employee Tenure<sup>2</sup>

**6%**  
 of U.S. workforce are  
 VETERANS<sup>2</sup>

**12%**  
 Employees covered by  
 collective bargaining  
 agreement<sup>2</sup>

**35%**  
 ETHNIC DIVERSITY  
 in U.S. workforce<sup>2</sup>

# G

**20%** 

Women on the Board of Directors<sup>2</sup>

**90%** 

Independent Board Directors<sup>2</sup>

**NYSE:CLH**

Public NYSE Company

<sup>1</sup>Data from 2019

<sup>2</sup>Data from 2020

## Our Vision, Mission and Core Values

---

### OUR VISION

*To be recognized as the premier provider of environmental and industrial services*

### OUR MISSION

*Creating a safer, cleaner environment through the treatment, recycling, and disposal of hazardous materials*

## S.T.I.C.S.

### THE CORE VALUES THAT MAKE US GREAT



#### Safety

We make safety our first priority



#### Teamwork & Collaboration

We achieve more working together



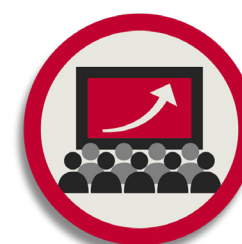
#### Integrity

We always do the right thing



#### Customer Service

We strive to exceed customer expectations



#### Stakeholder Value

We deliver superior results for our stakeholders

## Overview

# Our History

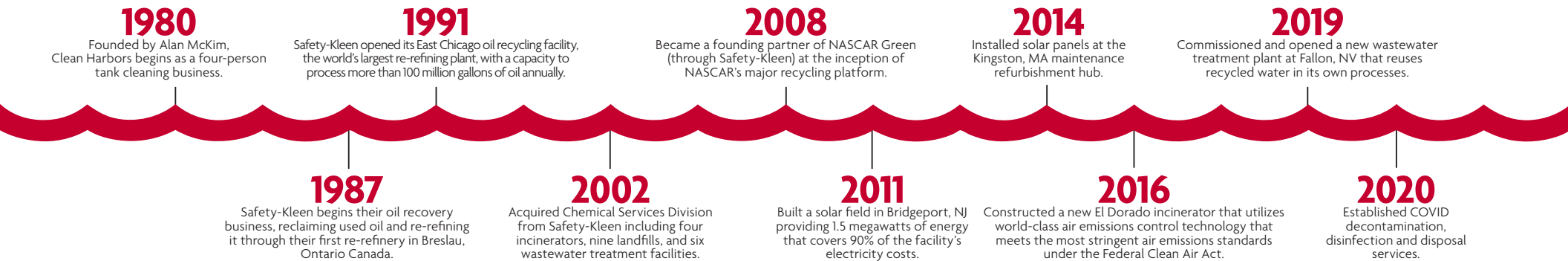
Clean Harbors is the leading environmental and industrial services provider and largest hazardous waste disposal company in North America. Clean Harbors is a recognized leader in environmental emergency response services. The company's branch locations are strategically located across North America in order to provide emergency response services and perform planned work at customer locations.

Founded by Alan S. McKim in 1980, Clean Harbors began as a four-person tank cleaning business. Today, Clean Harbors is a publicly traded company (NYSE: CLH) that maintains a vast network of service centers and hazardous waste management, treatment and disposal facilities, and provides a broad range of services. The Company employs more than 14,000 employees in the United States, Canada and India. Mr. McKim continues to lead the company as President, Chief Executive Officer and Chairman of the Board.

Over the last four decades, Clean Harbors has achieved steady growth through a combination of organic growth and acquisitions. Since 1980, the company has completed approximately 60 acquisitions that have expanded its geographic footprint and service offerings.

In 2012, Clean Harbors made its largest acquisition in Company history with the purchase of Safety-Kleen for \$1.25 billion. Safety-Kleen is North America's largest re-refiner and recycler of used oil and a leading provider of parts washers and related environmental services to commercial, industrial and automotive customers.

Today, Clean Harbors generates over \$3 billion in revenue annually and operates more than 480 service locations providing waste transportation and disposal, laboratory chemical packing, 24-hour emergency response, parts cleaning, and field and industrial services to over 300,000 customers across North America. The Company owns and operates waste management facilities offering a wide range of disposal options including incineration, wastewater treatment, landfill, recycling and specialty disposal.



## Overview

# Our Handprint on the Earth

Sustainability is not only about doing less harm to the earth or consuming less resources, it's also about doing more good and minimizing the cumulative impact of other companies. For Clean Harbors, this is at the core of what we do. Everywhere industry meets environment, Clean Harbors is on site, providing premier environmental and industrial services.

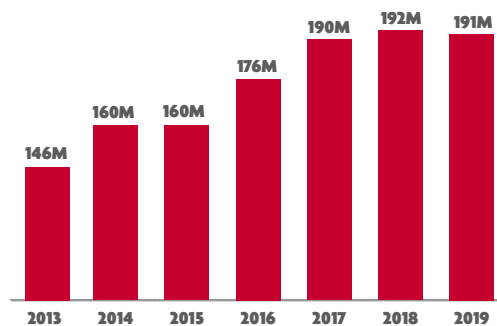
Clean Harbors Technical Services Business involves the packaging, collection, transportation, treatment and disposal of hazardous and non-hazardous waste at company-owned facilities. We operate the largest number of hazardous waste incinerators, landfills, wastewater and other treatment facilities in North America, along with the largest number of treatment, storage and disposal facilities. In 2019, our facilities incinerated 430,928 metric tons of waste (475,017 U.S. tons), 86% (372,512 metric tons) of which was hazardous waste.

Clean Harbors, through its Safety-Kleen business, is North America's largest re-refiner of used motor oil. We offer closed-loop solutions for recycling, reclaiming and reusing both used oil and cleaning solvent. In 2019, more than 235 million gallons of used oil was collected and recycled into more than 190 million gallons of high quality recycled oil products.

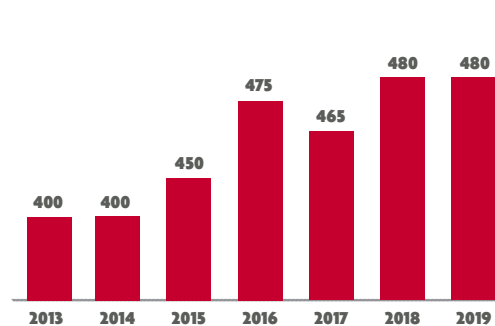
Clean Harbors facilitates thousands of Household Hazardous Waste (HHW) and pesticide collection programs throughout North America—collecting paints, solvents, batteries, fluorescent lamps, pesticides, cleaners and other hazardous materials during one-day, multi-day or mobile events. In 2019, Clean Harbors HHW services collected approximately 27,000 tons of hazardous waste.

Clean Harbors Industrial and Field Services involve a spectrum of services, from scheduled site decontamination projects to emergency response, which range from an oil spill to clean up of damage caused by natural disasters. On an annual basis, Clean Harbors responds to an average of more than 6,000 emergencies.

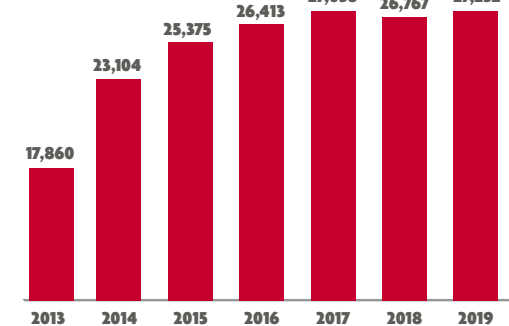
Re-refined Oil, Lubricants and Byproducts Produced (Gallons)



Service Locations



Household Hazardous Waste Collected (Tons)



## Overview

### Stakeholder Dialogue

Clean Harbors believes that through proper dialogue and staying engaged with our customers, communities and other stakeholders, we can contribute to the long-term health of the environment, society and economy. Some examples of our involvement in activities to foster stakeholder dialogue include:

- Formation of Community Relations Committees
- Establishment of Employee Resource Groups
- Internal Communications Portal
- Company Town Hall Meetings
- Participation in Investor Roadshows and Conferences
- Participation in Trade Associations, for example National Oil Recyclers Association (NORA) and Environmental Technology Council

We conduct our business through ongoing engagement with our key stakeholders, both internal and external. Two-way dialogue, media analysis, customer and employee surveys, investor roadshows and other outreach have helped capture the stakeholder views and concerns and therefore, the content for this report.





## Overview

# Sustainability and Clean Harbors

Reporting on our sustainable efforts and actions is extremely relevant to our stakeholders. Our investors, suppliers, customers, political and regulatory leaders, and employees increasingly want to know about the direct impacts of Clean Harbors' businesses, as well as environmental, social and governance (ESG) issues and trends. We used a wide array of tools to identify the issues of greatest importance to our internal and external stakeholders and our businesses.

## Our program is focused on the following strategies:

- **Health and Safety** – Making health and safety a priority in everything we do
- **Operations/Customer Solutions** – Developing and delivering the most sustainable customer solutions available supported by policies and procedures that ensure active management of environmental impacts across the organization
- **Environmental Commitment** – Providing services and products that lead the industry and contribute to a more sustainable world by operating business in an environmentally safe manner for the benefit and well-being of our employees, customers, the general public, and the countries where we work, and by maximizing energy and water conservation across the organization
- **Community Engagement** – Investing in communities where we live and work to create meaningful and positive impacts on education, community activities, and career related opportunities

- **Supply Chain** – Managing risk and driving sustainable practices through rigorous supply chain oversight; including holding our vendors to a code of conduct
- **Human Rights** – Committing to human rights is essential to our mission, our corporate culture and our business activities

To ensure we addressed the most significant ESG disclosures, we used the SASB Materiality Map – an interactive tool that identifies and compares ESG disclosure topics across different industries and sectors. The specific disclosures for Clean Harbors are detailed in the appendix to this report.

## SASB identifies seven key ESG disclosures for our industry as the following:

1. **Greenhouse Gas Emissions**
2. **Fleet Fuel Management**
3. **Air Quality**
4. **Management of Leachate and Hazardous Waste**
5. **Labor Practices**
6. **Workforce Health and Safety**
7. **Recycling and Resource Recovery**

*These reflect the SASB requirements for the categorization of our industry as Waste Management, which includes companies that collect, store, dispose of, recycle, or treat various forms of waste from residential, commercial, and industrial clients.*





# Environmental

*Our focus is to create a cleaner and safer environment, and our responsibility for the environment extends to the construction, maintenance, and operation of our facilities and fleet of vehicles and equipment.*

# Environmental

## Greenhouse Gas Emissions

Emissions of carbon dioxide and other greenhouse gases (GHG) are a primary driver of climate change. This is a global challenge and we all have a responsibility to work towards a lower carbon future, reduce GHG emissions and address risks responsible for accelerating climate change. At Clean Harbors, we take this responsibility seriously. We developed a system to calculate our GHG Scope 1 and Scope 2 emissions and assess our performance. We are evaluating the level of effort and cost to determine Scope 3 emissions and will provide an update on this process in the next couple of years. However, we continue to focus on those aspects of GHG emissions that are more fully under our control (Scope 1 and Scope 2) and prioritize improvements in our facilities and operations to reduce environmental impact.

|                               |  |
|-------------------------------|--|
| <b>GHG Scope 1: 1,546,128</b> | <b>Scope 1:</b><br>Greenhouse gas emissions from sources that are owned or controlled by the Company                 |
| <b>GHG Scope 2: 157,268</b>   | <b>Scope 2:</b><br>Greenhouse gas emissions from consumption of electricity, heat, or steam purchased by the Company |

Our Company’s footprint, people and assets, allow us to perform critical mitigation activities that improve the climate. Our work is focused on activities that include recycling of used motor oil and other products, and facilitating the proper destruction of ozone depleting substances. Much of what we do directly benefits the climate. For every ton of greenhouse gas we generate directly from our operations, two tons of GHG emissions are avoided.

We are the leading North American provider of services that protect the ozone layer from the destructive effects of chlorofluorocarbons (CFCs), which are 5,000 to 10,000 times more destructive to the ozone layer than other greenhouse gases. Clean Harbors has the most U.S. Environmental Protection Agency (EPA) approved CFC disposal capacity regulated under the Montreal Protocol, and we destroyed over 2,000,000 pounds of CFCs in 2019. The destruction of this volume of CFCs at our incineration facilities is equal to approximately 1,708,000 metric tons of CO<sub>2</sub>e emissions.

Used oil re-refining and recycling activities, including solvent recycling reduce emissions throughout global supply chains. Every year, our Safety-Kleen business collects more than 200 million gallons of used oil to return to the marketplace as high-quality clean, pure motor oil and associated products. Our state-of-the-art processes allow us to fully realize oil’s capacity to be recycled and reused indefinitely with quality equal to or better than lubricants made from virgin crude. Oil re-refining reduces greenhouse gases and heavy metal emissions when compared to burning used oil as fuel. Based on a lifecycle analysis, we estimate that re-refining one gallon of used motor oil saves 8 kilograms of greenhouse gas compared to a gallon of motor oil refined from crude oil. Our network of recycling facilities handles solvent from our customers and ensures the recycled solvents are restored to high-quality products that meet defined specification. All processing requirements meet strict local, state and federal regulations. Recycling solvents minimizes waste generation and GHG emissions while reducing waste disposal cost and raw material procurement. Our used oil re-refining and solvent recycling avoided over 1,846,000 metric tons of CO<sub>2</sub>e emissions in 2019.



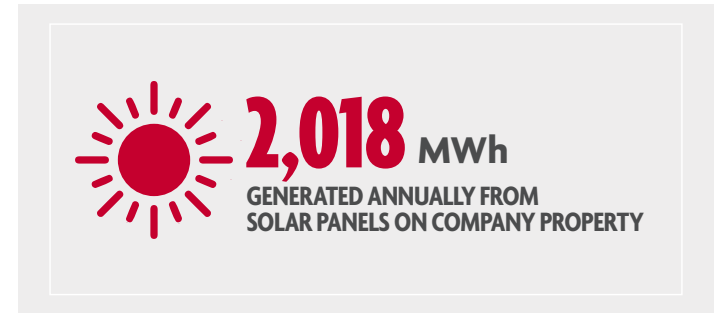
## Environmental

# Net Climate Benefit Factor

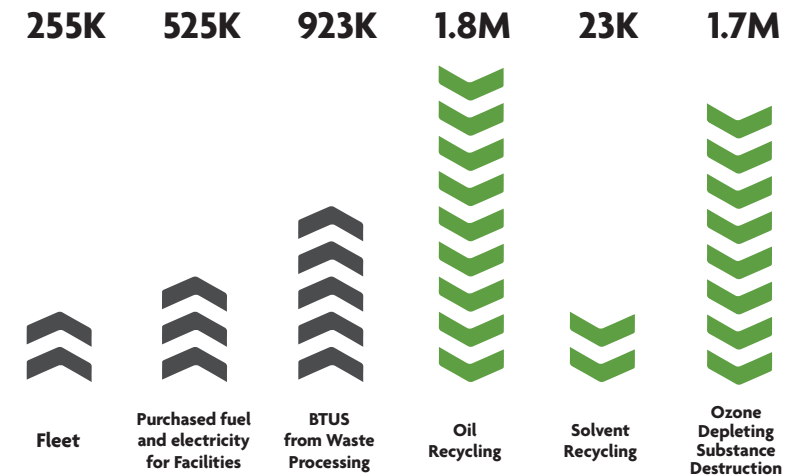
We calculate our Net Climate Benefit Factor by adding the emission benefits of our recycling, used oil re-refining and destruction of ozone-depleting substances (ODS) activities and then dividing this number by our total Scope 1 and 2 emissions. For purposes of calculating our 2019 Net Climate Benefit, we only included used oil re-refining and solvent recycling operations and converted ODS destruction activities. The avoided emissions associated with used oil re-refining and solvent recycling reflect the comparative impacts between the total lifecycle GHG inventory of Clean Harbors' product and an alternative product that provides an equal function. The reduction in CO<sub>2</sub>e emissions from ODS destruction is calculated by adding the quantities of ODS refrigerants incinerated at Clean Harbors' facilities and converting these quantities to CO<sub>2</sub>e using the Global Warming Potentials provided in the Intergovernmental Panel on Climate Change's (IPCC's) Fifth Assessment Report. Our operations incorporate several other recycling activities that we did not include in the calculation of our Net Climate Benefit Factor as we have not yet quantified the emissions benefits for those activities. We are working to quantify those benefits for 2021 and future years. These calculations are all completed using EPA factors, lifecycle analysis and tools that help us measure environmental impact. We have not determined or included in the calculation of our Net Climate Benefit factor our indirect emissions (Scope 3). Our Scope 3 emissions may be significant and could materially impact our Net Climate Benefit Factor if included in the calculation. We believe our role in mitigating climate change requires that we do more to develop and grow our recycling and re-refining services while seeking ways to reduce the environmental impacts of our operations.

Solar energy continues to be a viable option for certain facilities, and we have installed solar panels at several locations, most recently at our Benicia, CA facility. Our fleet refurbishment facility in Kingston, Massachusetts uses solar arrays to render the facility electrically self-sustaining. Interior and exterior lighting has been upgraded at many of our facilities with LED fixtures to reduce energy usage. Energy-efficient rotary screw air compressors help run the refurbishing operations.

We are committed to investigating opportunities to further reduce our GHG impact through energy-saving initiatives, such as greater use of renewable energy and more energy efficient lighting in our facilities.



### Calculating our 2019 Net Climate Benefit (Metric Tons of CO<sub>2</sub>e)



| 2019 Emissions                         |                  | 2019 Emission Prevention |                  |
|--|------------------|--------------------------|------------------|
| <b>Total</b>                           | <b>1,703,000</b> | <b>Total</b>             | <b>3,554,000</b> |
| <b>Emission Prevention</b>             |                  |                          |                  |
| Emission Prevention                    |                  |                          | 3,554,000        |
| ÷                                      |                  |                          |                  |
| Emissions                              |                  |                          | 1,703,000        |
| <b>Net Climate Benefit Factor = 2x</b> |                  |                          |                  |

## Environmental Fleet

With one of the largest private transportation fleets in North America, Clean Harbors makes fleet management and energy conservation a key focus. Fleet energy management begins with selecting vehicles with fuel economy in mind. Equipment is also designed to improve fuel economy. This approach is supported with a logistics team that reviews fleet routing to reduce total miles driven.

### Asset Refurbishment Program

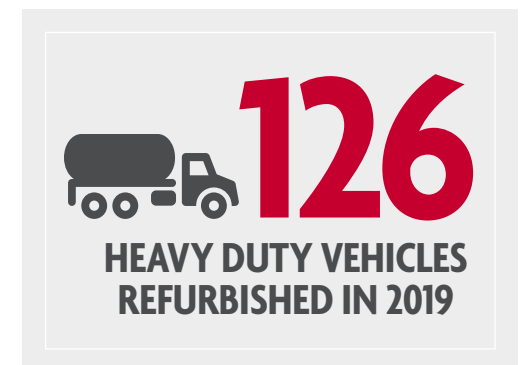
Operating a substantial fleet of transportation vehicles represents one of our largest opportunities to apply sustainable business practices. With a set of constantly aging assets, our focus is to run the fleet more efficiently and extend its useful life in order to avoid the environmental impact caused by manufacturing a new vehicle. Our Asset Refurbishment Program is a comprehensive effort to rebuild assets to like-new quality while reusing or recycling as much of the material as possible. With five facilities now operational, we can refurbish over one hundred highly technical vehicles used in our operations, like vacuum trucks, industrial air movers and waste oil trucks, every year. Our goal is to maximize the reuse or recycling of all materials. Currently, we recycle about 80% of the donor vehicle.

The refurbishment process includes:

- Removing still useful components and reusing them
- Rebuilding used components to like-new quality
- Capturing and recycling oil, coolant, oil filters and wash water

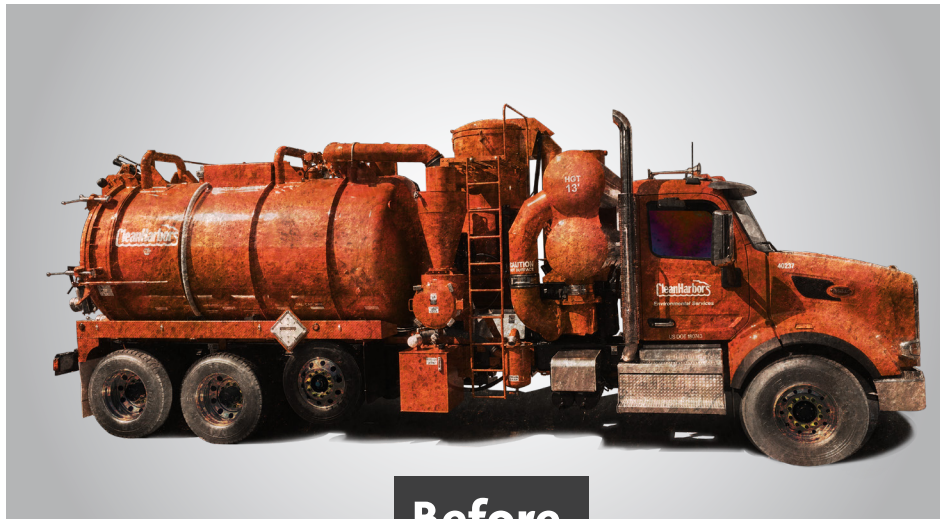
### The Asset Refurbishment Program provides benefits across all three aspects of sustainability:

- **Environmental:** Reduced impact
  - Significant waste volume is avoided by reusing or recycling 80% of the donor vehicle
  - Leaks, breakdowns and the resulting route inefficiencies are eliminated
  - Fuel efficiency is improved to be comparable with a new vehicle
- **Social:** Greater safety for employees and communities
  - Vehicles are fitted with the latest safety equipment
  - Vehicles are made safer by replacing electrical and other worn components with new, state-of-the-art equipment
- **Governance:** Sustainable economic development
  - Incremental jobs are generated at the refurbishing sites
  - Vehicle lifespan can be extended significantly
  - The process is scalable and repeatable across most of our heavy-duty fleet



## Environmental

### Asset Refurbishment Program



**Before**

- Average truck replaced is 15 years old
- Average fuel economy improved 2 miles per gallon
- 80% of donor vehicle is recycled/reused



**After**

- Rebuilding used components to like-new quality
  - Installing latest safety equipment
- Improving fuel economy from new engine and transmission meeting current emission standards
- Replacing electrical and other worn components with new state-of-the-art equipment
- Meeting California Air Resources Board (CARB ) compliance requirements



## Environmental

### Fuel Consumption

Clean Harbors makes fleet energy management a key focus, beginning with ongoing reviews by our logistics team to reduce total miles driven. Approximately four years ago, an initiative was put in place to centralize routing of services, which resulted in streamlined routing and reduced redundancies. This initiative, along with improvements in the route optimization system, has led to a 12% reduction in miles driven. We anticipate greater improvements, as the Company has invested in artificial intelligence technology designed to identify customer trends allowing for adjusted service terms that will further optimize routing. This will eliminate unnecessary customer stops and ultimately reduce miles driven.

We also evaluate options for reducing fuel consumption through use of rail transportation, implementation of alternative fuel vehicles and using our own Performance Plus and EcoPower re-refined engine oils throughout our fleet. Clean Harbors is constantly upgrading our truck fleet with the most fuel-efficient systems and parts. We designed custom, multi-compartment trucks that can be used to simultaneously collect and deliver oil, decreasing fuel consumption.



## Environmental



Photo above: El Dorado, AR. incinerator

## Air Emissions

### High-Temperature Incineration

Clean Harbors is the industry's leading provider of high-tech, high temperature incinerators that destroy hazardous and industrial waste. With approximately two-thirds of North America's incineration capacity, we operate nine incinerators at five facilities in the United States and Canada, including our recently expanded El Dorado, Arkansas facility.

Clean Harbors El Dorado facility is designed to be North America's most technologically advanced hazardous waste incinerator. Employing world-class air emissions control technology that meets the most stringent air emissions standards under the Federal Clean Air Act, it is the first American commercial hazardous waste incinerator to come online in nearly 20 years.

Our incineration facilities specialize in high-temperature incineration of regulated waste materials - such as industrial and laboratory chemicals, manufacturing byproducts, medical waste, fertilizers and other solid and liquid materials - that would otherwise be hazardous to the environment and public health if not properly managed. Destruction in high-temperature incinerators has been determined by the U.S. Environmental Protection Agency, after extensive review, to be the Best Demonstrated Available Technology (BDAT) for safely and effectively destroying many hazardous waste compounds, including organic compounds high in ammonia, chlorine, fluorine and halogens.

**WORLD-CLASS  
AIR EMISSIONS  
CONTROL  
TECHNOLOGY**





## Environmental

### Recycle and Reusable Resources

#### OilPlus® Closed-Loop Program

Our Safety-Kleen business offers a program, unique to the oil industry, designed to help companies manage their oil needs in a more sustainable way. The Safety-Kleen OilPlus® Program provides superior used oil pickup, along with reliable delivery of high-quality finished lubricants and other products. The result is greater efficiencies, guaranteed sustainable processing and a direct reduction in GHG emissions.

#### Oil Collection

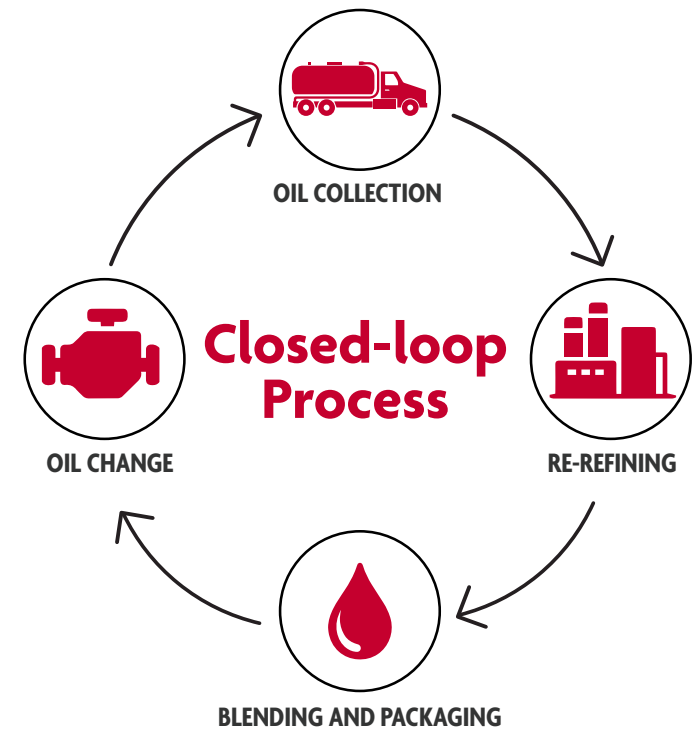
Using advanced logistics tools, we deploy our fleet of trucks, tankers, rail-cars and barges to collect used oil from thousands of locations across the United States, Canada and Puerto Rico. Our expert service representatives collect this oil using the industry's safest and most efficient methods.

#### Re-refining and Blending

Safety-Kleen's advanced re-refining technologies and processes have earned the latest ISO9001:2015 certification. Over their lifetime, our re-refineries have re-refined more than 3.9 billion gallons of used oil, avoiding over 30.3 million metric tons of GHG. According to the U.S. Environmental Protection Agency (EPA), that's the equivalent of 500 million trees seedlings growing for 10 years or taking more than 6.6 million passenger cars off the road for one year.

Used oil re-refining reduces greenhouse gases and heavy metal emissions – a far more sustainable solution than burning used oil as fuel. Our re-refining process requires up to 80% less energy to produce reclaimed oil than to refine oil from crude. Just one gallon of recovered motor oil produces the same amount of engine oil as 42 gallons of crude. Re-refining is simply a better way to manage used oil, thereby reducing the impact on the environment.

MORE THAN **235** MILLION GALLONS  
of used oil collected in 2019.



## Environmental

Every year, Safety-Kleen returns approximately 190 million gallons of collected used oil to the marketplace as clean, pure recycled motor oil and associated products. Our state-of-the-art processes enable us to fully realize oil's remarkable capacity to be recycled, re-refined and reused indefinitely, with quality equal to or better than lubricants made from virgin crude oil.

### New Products Returned to Market

The re-refined oil we produce is used in numerous engine oil and industrial lubricant brands, including our own Performance Plus® and EcoPower®. These products meet or exceed the same exacting standards applied to oil made from virgin crude, allowing corporate customers and consumers to realize the dual benefit of protecting both their engines and the environment. By having us collect used oil and deliver new re-refined oil products, customers are implementing a quintessential closed loop process for sustainability to the oil industry. To maximize delivery efficiency, reduce energy use and lower GHG, Clean Harbors has designed custom, multi-compartment trucks that simultaneously collect and deliver oil. This unique delivery system brings the world's most sustainable used oil program to North America.



### Parts Washer Solvent Technology

Safety-Kleen is at the forefront of cleaning chemistry technologies for parts washer machines. Aqueous cleaners are water-based solutions that, unlike petroleum-based solvents, are typically nonflammable and contain little or no volatile organic compounds (VOCs). As individual States and Canadian provinces started requiring aqueous solutions, Safety-Kleen remained a leader in the field by transitioning customers to environmentally friendly solutions.

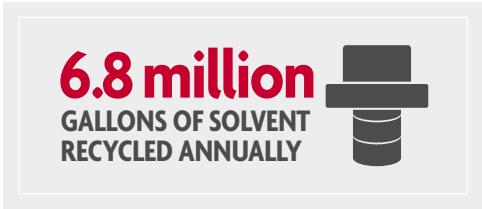
Safety-Kleen partnered with Church & Dwight, the maker of Arm & Hammer™ products, to form ArmaKleen™. Together, we have developed the industry's most environmentally functional and productivity-boosting aqueous cleaners. With more and more companies actively looking to protect their workers and meet strict environmental regulations, ArmaKleen offers the ideal solution with a versatile, proven line of aqueous cleaners that is both economical and earth friendly.





### Solvent Recycling

Recycling solvents is a sustainable alternative for any business. Our strategically located facilities can recycle used solvents to exact specifications. We recycle 6.8 million gallons of solvent annually. Our tolling programs provide a closed-loop cycle, where a customer's spent solvents are recycled to precise specifications and returned directly to the customer. Other solvents are recycled to our own specifications and high standards for use or resale.



### Parts Washer Refurbishment

We proudly make our Safety-Kleen parts washers in the United States, primarily at our Wisconsin facility. Additionally, we refurbish and place back into service thousands of parts washers and parts washer components annually. Our refurbishment activities allow us to extend the life of our parts washers and avoid disposal of over 500 tons of metal and plastics annually.

### Chemical Recycling and Reuse

Companies committed to waste minimization, good product stewardship and the Responsible Care Program can benefit by having their chemical solvents recycled. Our chemical recycling and reuse initiative provides a comprehensive, step-by-step approach that evaluates customers' R&D and manufacturing operations and pursues opportunities for waste reuse, recycling or reclamation. Whether the waste stream is sold as is, recycled or reused, the impact on the environment is minimized.

### Fuel Blending

Our fuel blending operations provide an economical and environmentally friendly recycling option for solvent-based liquids, solids and sludge. The process blends organic waste streams into alternative fuel to be used as an energy source in manufacturing cement. The process conserves natural resources by replacing coal, oil and other fossil fuels.

### E-waste (Electronics and Equipment Recycling Disposal)

Clean Harbors uses a process of breaking down electronics and equipment in order to separate e-waste that can be recycled from waste for disposal. We ensure that equipment is de-manufactured and that hazardous components are identified and removed for proper disposal. E-waste is sent to 3rd parties for recycling to be economically managed for recycle value, in accordance with applicable regulations.



### Light Bulb Recycling

We process straight tubes, U-tubes and circular lamps using a sophisticated material separation technique. The recycling process for fluorescent bulbs separates the metal, glass and mercury-containing phosphors. All components of the bulb are either recycled or reused, offering a responsible alternative to landfill.





# Social

*Together we achieve more*

## Social

### Our People

At Clean Harbors, our people are our greatest asset. We are committed to the safety and well-being of our employees and strive to cultivate a culture of inclusion that values diverse perspectives across our global workforce. We value every voice at Clean Harbors and conduct employee surveys to listen to our people and take action to improve our business. More than 82% of our employees completed our 2020 global employee survey. We saw positive results from the actions we took in response to the 2019 employee survey and are implementing specific actions in response to feedback from our employees in the 2020 survey.

We recognize our employees for their commitment and outstanding work. On an annual basis, through a nomination process, approximately 90 employees are recognized with a Chairman's Award for their achievements and contributions to the Company.

We also award employees with recognition and cash compensation for upholding the Company's Core Values awards through a nomination process involving fellow employees.



**More than**  
**14,000**  
**employees**

as of December 31, 2020

## Social

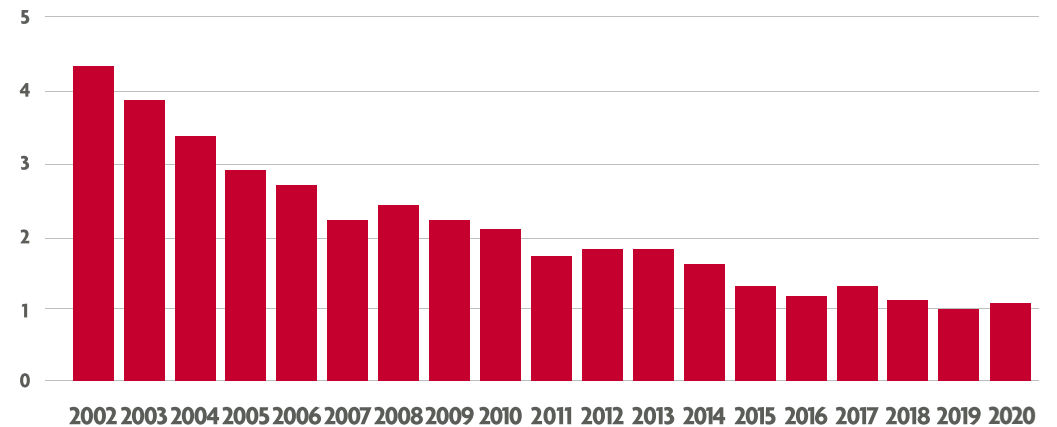
# Health and Safety

**Safety is our No. 1 commitment and our passion. Our top priority is to continually improve safety.**

We believe that no one should get hurt while on the job, and we continuously strive to reach zero safety related incidents. We also recognize that it is our 100% personal commitment that will have the most impact on our own safety and that of our employees, customers, families, the community and the environment. Through our words and actions, we reinforce acceptable safety practices and stop unsafe acts before they become a statistic.

Clean Harbors' "Safety Starts with Me: Live It 3-6-5" initiative enhances our safety culture by fostering goodwill and driving home the importance of working safely for our Company. Every day, whether we are at Clean Harbors, a customer site, in transit or at home, we pledge to be safe and work safely. It's a lifestyle commitment.

## TRIR Performance



**Safety Starts with Me:  
Live It 3-6-5**

**3 SAFETY PHILOSOPHIES**

1. Nothing is worth getting injured over.
2. All near misses and accidents are preventable.
3. Safety must be actively managed.

www.cleanharbors.com/safety

**Safety Starts with Me:  
Live It 3-6-5**

**6 GOLDEN RULES OF SAFETY**

1. I will drive responsibly without distractions or impairments.
2. I will think before I start and know my safety plan every day.
3. I will only undertake the work in which I am trained.
4. I will take responsibility for my safety and those around me at work, home or in transit.
5. I will intervene in any unsafe act.
6. I will report all incidents and near misses.

www.cleanharbors.com/safety

**Safety Starts with Me:  
Live It 3-6-5**

**5 GOOD REASONS WHY I WANT TO BE SAFE**

www.cleanharbors.com/safety



## Social

### COVID Support

The coronavirus pandemic continues to significantly impact our employees, customers, investors and other stakeholders. As such, it is important to highlight Clean Harbors' response to this the ongoing crisis.

For Clean Harbors, safety is one of our five core values and remains our number one priority. Our response to the pandemic reflects this philosophy. In early March 2020, we implemented travel restrictions for our employees and by month's end, all administrative and office personnel had transitioned to working from home. We provided our employees with the resources to safely navigate these difficult times, from providing supplies including reusable masks, wipes and hand sanitizer to greater technology capabilities and access to mental health resources.

As a Company, responding to emergencies is part of who we are and what we do. In direct response to the pandemic, Clean Harbors deployed Coronavirus Decontamination, Disinfection and Disposal Services to restaurants, retail establishments, schools and a myriad of other facilities to assist in ensuring these places were safe to reopen.



## Social

### Diversity and Inclusion

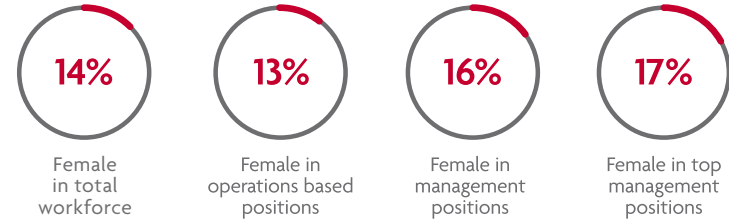
Over the past 40 years, Clean Harbors has recognized that a spirit of inclusion attracts the widest possible spectrum of experiences, skills, talents, and perspectives among our employees.

As a company that serves thousands of people in hundreds of communities, we are in a unique position to acknowledge and appreciate the intrinsic value of diversity and inclusion. As a result, we actively look for opportunities to encourage individuals, business organizations and community groups to join us in driving awareness and change.

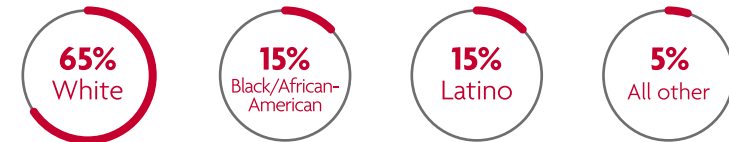
#### Clean Harbors Named a Top Company by Women in Trucking Association



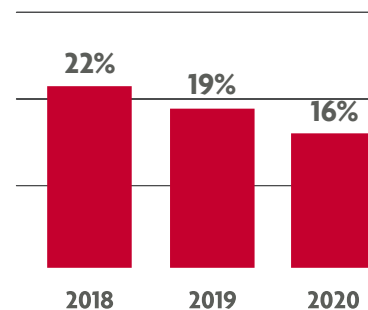
#### Gender Representation <sup>1</sup>



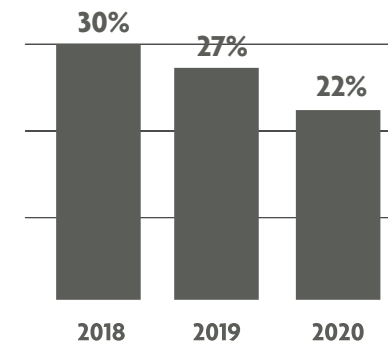
#### Ethnic Diversity Breakdown <sup>2</sup>



#### Voluntary Turnover



#### Total Turnover



<sup>1</sup> Workforce in North America as of 2020  
<sup>2</sup> U.S. workforce as of 2020



# Social

Leading our diversity and inclusion initiatives is our Diversity and Inclusion Steering Committee, whose members are highly engaged in our Employee Resource Groups (ERGs). Through our seven ERGs, we want to increase a sense of belonging, inclusion and collaboration among our employees. The purpose of these groups is to contribute suggestions, leadership and passion to areas such as onboarding, recruitment, retention and culture/engagement.

## 7 Employee Resource Groups

- African American/Black**
- Asian**
- Indigenous/Native American**
- Latinx**
- LGBTQS2**
- Veterans**
- Women**

At Clean Harbors, we recognize veterans for their service and sacrifice — for safeguarding our freedoms and values. We also know that members of our armed forces bring valuable skills to our workplace. That’s why we actively seek to employ and develop veterans, active duty National Guard members and reservists, who are sources of strength, courage and integrity.



For the past few years, Clean Harbors has partnered with the U.S. Army as part of the Partnership for Youth Success (PaYS) Program. The program provides assistance to young soldiers by guaranteeing an interview and possible employment after their service in the U.S. Army.



## Social

### Human Rights

We are committed to fundamental human rights. We affirm to our employees, customers, shareholders and the public that we will always conduct our business activities in a manner that respects human rights and strives to create better standards of life and freedom for individuals. Respect of human rights is fundamental to the sustainability of our organization and critical to maintaining the respect of the communities in which we operate.

#### Clean Harbors respect of human rights is demonstrated in our following employment practices:

- **Equal Opportunity, Inclusion and Respect** – We promote an inclusive environment where all individuals are welcomed and valued. Clean Harbors has adopted policies and training that address the protection and support of the rights of women and minorities in the workplace. All applicants and employees are respected and treated as individuals without regard to their race, color, religion, sex, sexual orientation, gender identity or expression, national or social origin, ethnicity, age, disability, veteran status, genetic testing or any other classification protected by law.
- **Healthy Workplace and Lifestyle** - We believe that an accident-free workplace is a goal we can achieve and that no one should get injured while working at Clean Harbors. We are committed to operating our facilities and equipment in a safe and efficient manner and in compliance with all applicable federal, state and local safety and health laws, regulations and standards. We have established employee wellness programs to promote a culture of health for the benefit of our workforce and to drive engagement in our health and retirement plans.
- **Safe and Secure Workplace** - We promote a workplace free from violence. Any acts or threats of violence will not be tolerated.
- **Pay, Benefits and Work Hours** - Our employee compensation is competitive and reflects geographical differences, complexity and scope of position, and business unit or division, while remaining consistent with all applicable laws.
- **Freedom of Association and Collective Bargaining** - In accordance with applicable labor laws, we respect the right of our employees to form, join or assist labor organizations and to bargain collectively through representatives of their own choosing without fear of retaliation, intimidation or harassment.
- **Forced Labor, Human Trafficking and Child Labor** - We prohibit the use of all forms of forced labor, including, but not limited to, prison labor, military labor, slave labor and any form of human trafficking. We do not employ children or support the concept of child labor.
- **Community and Stakeholder Engagement** - We are dedicated to being a good neighbor in the communities in which we live and work. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business.

*\*Our Human Rights policy was developed with consideration of the United Nations Universal Declaration of Human Rights.*



# Social

## Development and Training

Recognizing that our people are our greatest asset, Clean Harbors believes in development through training programs. Clean Harbors invests millions annually to produce and deliver internal training and leadership development. These programs range from keeping our employees up to date on their OSHA training to providing classes to further develop their knowledge and skills. For employees who wish to expand their skills further, Clean Harbors provides access to a virtual platform to assist in developing and fine-tuning leadership skills.

The Company offers a Branch Manager training program that is broken up into three main categories: Onboarding, Mentor Branch Training and Onsite Training. The program typically takes 13 to 15 weeks to complete depending on scheduling and culminates with a certification.



**5,900**  
internally offered  
training courses

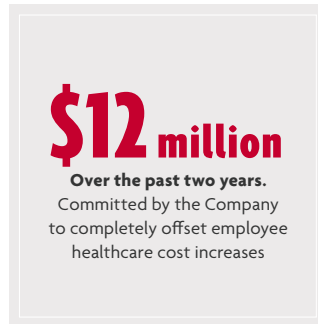


**730,000**  
training classes  
completed in 2019



**35**  
new branch  
managers are  
trained each year

## Social



## Compensation and Benefits

Clean Harbors' values are the foundation of our commitment to well-being — physical, emotional, social and financial—and our total rewards program reflects this belief. We provide our employees a 401(k) match contribution, affordable health care and a wellness program that encourages a healthy active lifestyle through employee challenges and rewards. Through our healthcare insurance, there are annual reimbursements available to employees who have spent money on weight loss programs and/or fitness centers. Understanding that an employee's health goes beyond their physical well-being, the Company offers an Employee Assistance Program that is critical to ensuring the emotional and social well-being of all our employees.

Our employee compensation is competitive and reflects geographical differences, complexity and scope of position. Clean Harbors managers and employees are involved in an annual goal review process that encourages growth, engagement and performance. This process strengthens the culture of feedback and development for each employee. The goals are linked to not only the Company's financial performance but in many cases, the health and safety metrics set by the Company.

Field employees are also entitled to an incentive plan that is connected to their facility and individual performances related to financial and safety metrics.

Clean Harbors recognizes that employee development should not only focus on areas that have a positive impact on their performance within the Company but also should reflect individual growth. To encourage employee development, Clean Harbors offers a tuition reimbursement program that provides financial assistance to employees who want to complete an undergraduate or advanced degree, participate in non-degree refresher courses, prepare for a professional certification or participate in other non-degree certificate programs.

<sup>1</sup>Data from 2019

## Our Community

By investing in communities where we live and work, we create meaningful and positive impacts. Our investments are primarily focused on education, community activities, and career related opportunities.



Clean Harbors, following the filming of our episode of “Undercover Boss,” received a cameo in another episode by surprising the Shreveport, Louisiana police and fire departments with donations totaling \$25,000. This money helped fund new fire department equipment and the police department’s after-school basketball program.



Clean Harbors partnered with Wreaths Across America to assist in the pickup and delivery of approximately 11,000 wreaths. Veteran employees laid the wreaths at local cemeteries.

## Social

### Notable community engagements:

#### Buttonwillow, California

- Engagement since the 1990s with a total of \$10 million in contributions over that timeframe dedicated to the Buttonwillow Community Foundation, which was founded by the facility in cooperation with the City of Buttonwillow. Funding was used to build youth sports facilities and expand local Buttonwillow primary and secondary environmental and STEM studies education coupled with funding annual week-long environmental studies camp for 6th grade students.

#### Colfax, Louisiana

- Company-supported scholarships at Northwestern University of Louisiana of \$20,000 per year
- \$15,000 spent yearly on a variety of Colfax community projects (Annual Pecan Festival, lake boat ramp installation, local sheriff search and rescue boat purchases)

#### Lambton Landfill and Incineration Complex, Ontario

- Monetary subsidy provided to Saint Clair Township based on tipping fee /ton with a minimum of \$625,000 annually
- Good Neighbour Program which provides all residents living within 1.5 kilometer of our facility with an annual stipend based on a dedicated tipping fee
- Extensive collaboration with local and regional First Nations organizations. Grants totaling \$65,000 annually has garnered support for this critical cultural resource



### Indigenous Community

We have done extensive work with our Indigenous partners in Canada to ensure that our vision for the future is firmly rooted in our support of the elements of United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) – the fundamental foundation of our mutually beneficial Indigenous relationships.

In the spirit of treaties, and in accordance with constitutional protections of both Indigenous and treaty rights of Indigenous peoples, we endeavor in every respect to support Indigenous communities through a variety of initiatives including, but not limited to:

- Direct hiring of community members where we operate
- Supporting providers of goods and services within the community by sourcing out those resources locally
- Participating and funding for cultural events
- Revenue sharing
- Donating tangible support to educational institutions, sporting, and community groups

Newly implemented processes designed to support indigenous partnerships and communities resulted in an increase in Indigenous applicants seeking employment with Clean Harbors and monetary contributions through Indigenous-focused procurement and revenue sharing in excess of \$4.8 million.



# Governance

*Fosters a culture of integrity and leads to a positive performing and sustainable business.*

## Governance

# Corporate Governance

The Board of the Company is currently composed of 10 directors classified into three classes. There are now four Class I directors, three Class II directors and three Class III directors. One class of directors is elected each year for a term of three years. The Board believes diversity is consistent with the goal of creating a Board that best serves the needs of the Company and the interests of its shareholders and is one of the factors considered when identifying individuals for Board membership. Of the 10 current directors of the Company, two are female and one is an African American.

Over the past several years, the Clean Harbors Board of Directors has developed corporate governance practices to help fulfill its responsibility to shareholders to oversee the work of management and the Company's business results. The governance practices are in place to assure shareholders of the Clean Harbors Board of Directors' commitment to independent and transparent governance and the alignment of the interests of directors and management with those of shareholders.

### **The Board has established four committees:**

**Audit Committee** – The primary responsibilities of the Audit Committee are to select the Company's independent registered public accounting firm, review the scope of and approach to audit work, meet with and review the activities of the Company's internal auditors and the Company's independent registered public accounting firm, fulfill oversight responsibilities relating to the integrity of the Company's financial statements, related party transactions and policies with respect to risk assessment and risk management and oversee the Company's policies regarding employee complaints and a summary of complaints received.

**Compensation Committee** - The primary responsibilities of the Compensation Committee are to recommend to the full Board the base salary for the Chief Executive Officer, review and approve the base salary for the other senior executive officers, administer the Company's management incentive cash bonus plans and equity incentive plans, review and approve certain aspects of the Company's other management compensation policies and monitor executive officer succession planning.

**Corporate Governance Committee** - The primary responsibilities of the Corporate Governance Committee are to serve as a nominating committee for directors and the Lead Director, recommend committee structures, review director independence and compensation, and assist the Board in reviewing the performance of the Board and the Chief Executive Officer.

**Environmental, Health and Safety Committee** - The primary responsibilities of the Environmental, Health and Safety committee are to provide oversight of the policies and compliance related to the Company's environmental, health and safety commitments. See further details in Sustainability Governance.





## Governance

# Sustainability Governance

Clean Harbors' commitment to sustainability is reflected across the entire organization, including the Board level. The Environmental, Health and Safety Committee was established with the principal purposes of (1) fulfilling the Board's oversight responsibilities for the Company's policies and practices related to human health and safety, operational safety and regulatory and environmental compliance; and (2) reviewing the impact of these policies and practices on the Company's corporate social responsibility, sustainability and reputational goals. Clean Harbors management retains responsibility for assuring the Company's compliance with applicable environmental, health and safety laws and regulations.

### The scope of the Committee's oversight responsibilities include the following:

- Review the Company's major compliance programs with respect to regulatory requirements including, but not limited to, the Company's policies and procedures for monitoring employee health and safety and regulatory and environmental compliance
- Review the status of the Company's environmental, health and safety policies, practices and performance, including an evaluation of the effectiveness of management's programs for compliance with applicable laws and regulations
- Review emerging environmental, health and safety issues, as well as proposed laws and regulations, and their potential impact on the Company, including its operations, financial results, risk exposure and reputation
- Review management's evaluation of the potential environmental, health and safety effects and/or risk exposure related to projects for which management is seeking Board approval
- Review of significant capital expenditures that may have a material environmental, health and safety impact
- Periodically conduct site visits to one of the Company's operating locations to assess its environmental, health and safety programs and practices
- Review the Company's major environmental, health and safety liabilities reported in the Company's financial statements
- Review the Company's benchmarking of environmental, health and safety programs of other companies (within and outside of our industry) to ensure that best practices are being implemented
- Review the Company's corporate social responsibility, including sustainability, community relations, and legislative activities

## Governance

# Compliance and Ethics

Clean Harbors' policy is to promote high standards of integrity by conducting its associations and interactions honestly and ethically. To do this, the Company has established a Code of Conduct that is binding for all employees and a Vendor Code of Business Conduct and Ethics that applies to its suppliers.

### Key aspects of the Clean Harbors Code of Ethics and Business Conduct are:

- Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest
- Promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (SEC) and in other public communications made by the Company
- Promote compliance with applicable governmental laws, rules and regulations
- Promote the protection of Company assets, including corporate opportunities and confidential information
- Prohibit bribery and corruption; promote fair dealing practices
- Deter wrongdoing
- Ensure accountability for adherence to the Code

### The key principles of the Vendor Code of Business Conduct and Ethics establish the minimum standards that must be met by any vendor that sells goods to or does business with Clean Harbors regarding:

- Vendor's treatment of workers
- Workplace safety
- Impact of Vendor's activities on the environment
- Vendor's ethical business practices

These codes are the foundations of the Company's compliance and ethics management system and are publicly available on the Company's website, [www.cleanharbors.com](http://www.cleanharbors.com). Clean Harbors provides employees with an integrity line to allow them to make a confidential report of a violation or suspected violation of this Code and does not tolerate any acts of retaliation against an employee who makes a good faith report of a known or suspected violation of these codes.



## Governance

## IT Security and Cybersecurity

At Clean Harbors, we utilize people, processes and technology controls to protect our IT systems and data through a comprehensive risk-based information security program based on industry best practice frameworks such as The National Institute of Standards and Technology (NIST). These frameworks employ a design approach using overlapping layers of technology protections, standards, and associated business processes to ensure comprehensive coverage and effectiveness.

Risk-based analysis is used to prioritize deployment of controls, combined with routine assessments conducted to gauge effectiveness of the program controls against our maturity objectives. Visibility of these assessments is maintained through senior management levels of the organization. In line with our commitment to building and improving trust with our stakeholders, we incorporate privacy by design into our personal data processing activities.

The increasing threat to IT systems and information remains a concern and increased focus is given to this area through a series of mandatory cyber-security awareness courses. Email is the most commonly used attack vector followed by infected web sites. Every day more than 175,000 malicious emails are sent to Clean Harbors addresses. The vast majority of these are stopped by technical barriers due to undesirable or potentially harmful content. However, there are still emails getting through that may pose a risk to the Company. Our employees are the Company's main barrier in this context, and we are actively working to ensure that all of them have the knowledge and tools they need to reduce the likelihood of malware being uploaded to our network. We are committed to protecting personal information of our employees and customers. We investigate incidents and customer privacy complaints thoroughly in accordance with applicable regulations.

## Outlook

### Outlook

## 2030 Goals and Benchmarks

### Alternative Energy Vehicles

**E**

Grow the percentage of alternative vehicles, in our light-duty fleet to over 10% by 2030

|               |                |
|---------------|----------------|
| <b>2019</b>   | <b>2030</b>    |
| <b>&lt;1%</b> | <b>&gt;10%</b> |

### Increase Recycling

Increase recovery of key materials, by 25% on a combined basis by 2030

|              |              |
|--------------|--------------|
| <b>2019</b>  | <b>2030</b>  |
| <b>1.4 M</b> | <b>1.7 M</b> |
| metric tons  | metric tons  |

### Renewable Energy

Increase the use of renewable energy at our facilities, including landfill gas, solar, and other sources generated at company facilities

|                  |                  |
|------------------|------------------|
| <b>2019</b>      | <b>2030</b>      |
| <b>2,018 MWh</b> | <b>3,000 MWh</b> |
| Annually         | Annually         |

### Health & Safety

**S**

Improve our safety performance, reducing our Total Recordable Incident Rate (TRIR), a measure of accidents and injuries compared to hours worked

|             |                |
|-------------|----------------|
| <b>2020</b> | <b>2030</b>    |
| <b>1.15</b> | <b>&lt;1.0</b> |

### Community Giving

Increase our community giving, including charitable donations, in-kind services, and sponsorships at a Corporate level

|                             |                 |
|-----------------------------|-----------------|
| <b>2019</b>                 | <b>2030</b>     |
| <b>&gt;\$1M<sup>1</sup></b> | <b>&gt;\$2M</b> |

### Investment in Training

Increase our annual investment in training and employee development to enhance employee engagement and reduce turnover

|                            |                          |
|----------------------------|--------------------------|
| <b>2019</b>                | <b>2030</b>              |
| <b>\$3.8 M<sup>2</sup></b> | <b>\$5 M<sup>2</sup></b> |

### Board Diversity (Gender)

**G**

Increase Board Diversity, from 20% to 40% to better align governance to our workforce

|             |             |
|-------------|-------------|
| <b>2020</b> | <b>2030</b> |
| <b>20%</b>  | <b>40%</b>  |

### Board Diversity (Ethnic)

Increase Board Diversity, from 10% to 20% to better align governance to our workforce

|             |             |
|-------------|-------------|
| <b>2020</b> | <b>2030</b> |
| <b>10%</b>  | <b>20%</b>  |

### Incentive Plans (ESG Goals)

Grow the percentage of management incentive plan goals, that are tied to ESG from 20% to 30% of possible payout

|             |             |
|-------------|-------------|
| <b>2019</b> | <b>2030</b> |
| <b>20%</b>  | <b>30%</b>  |

<sup>1</sup>This amount is only Corporate giving. In addition much of our community spending was at a local branch level.

<sup>2</sup>This amount represents only the training department costs and does not capture the wages paid to employees during training.

## Appendix

### SASB Disclosures – 2019 Accounting and Metrics Activity

| Code                            | Accounting Metrics  | Unit of Measure                                       | Data, Omission & Explanation (2019)   |
|---------------------------------|---|---|---|
| <b>Greenhouse Gas Emissions</b> |   |   |   |
| SASB IF-WM-110a.1               | (1) Gross global Scope 1 emissions, (2) percentage covered under emissions-limiting regulation, and (3) percentage covered under emissions-reporting regulation         | Metric tons (t)<br>CO <sub>2</sub> e Percentage (%)   | 1,546,128 Metric tons CO <sub>2</sub> e (2) 84% (3) 84%<br><br>Scope 1 emissions include emissions from our facilities, landfills, and fleet that are owned, leased, or operated by Clean Harbors. Scope 1 emissions are not a measured metric. We include operational processes in our scope 1 calculation, some of which are estimates based on (a) waste composition and volume at our incinerators, (b) fuel and vapor extracted from used oil refining and used for heat, (c) landfill gas generation estimates calculated using U.S. 40 CFR Part 98 Subpart HH and Subpart TT methodology. Except for fleet emissions we believe that sustainably all our Scope 1 emissions are subject to emissions limiting and emissions reporting regulations.  |
| SASB IF-WM-110a.2               | Total landfill gas generated, percentage flared, percentage used for energy   | Million British Thermal Units (MMBTU); Percentage (%) | The SASB guidelines request disclosure of the total landfill gas generated in millions of British Thermal Units (MMBTU) using the calculation methodology in U.S. 40 CFR 98.340-348 Subpart HH. This methodology is applicable to Municipal Solid Waste landfills (the type of landfills regulated under Subpart HH). These calculations are known to have a margin of error of +-200%. As of December 31, 2019, the Company had 11 active landfill sites. Of these 11 landfills only one landfill (Altair, TX) is a subpart HH landfill. Altair's estimated landfill gas emissions were 73,420 MMBtu in 2019 calculated following the methodology required by the SASB guidance. In addition, across our remaining 10 landfills only two regulated under Subpart TT were required to estimate emissions based on total waste volumes. Those two landfills estimated emissions using the methodology for Subpart TT and reported 108,249 MMBtu's in 2019. The other landfills we operate are hazardous waste landfills that are not required to estimate GHG emissions as their design and waste composition indicate that they are below the reporting threshold requirements. 0% flared and 0% used for energy. |
| SASB IF-WM-110a.3               | Description of long-term and short-term strategy or plan to manage Scope 1 emissions, emission-reduction targets, and an analysis of performance against those targets. | Not Applicable  | Over the next 15 years, we intend for our used oil collection and recycling, our solvent recycling and our other services to result in an overall reduction of GHG emissions three times greater than our Scope 1 and Scope 2 emissions generated by our own operations. In 2019, that ratio was slightly over two.<br><br><b>Targets and Progress:</b><br>We are currently working to establish specific targets related to Scope 1 and Scope 2 emissions. We plan to publish those targets on the sustainability page of our website once they are available.<br><b>Emissions strategy/management:</b><br><ul style="list-style-type: none"> <li>Invest in processes and technology to increase the recycled content obtained from waste processing.</li> <li>Further our renewable energy production through investment in commercially viable technologies <ul style="list-style-type: none"> <li>Continue to improve fuel economy in our fleet vehicles</li> <li>Continue to improve energy efficiency at our facilities</li> </ul> </li> <li>Measure and if significant capture methane at our landfills for use</li> <li>Recycle materials for the greatest environmental benefits</li> </ul>              |

## Appendix

| Code  | Accounting Metrics   | Unit of Measure                   | Data, Omission & Explanation (2019)   |
|---|--|-----------------------------------|---|
| <b>Fleet Fuel Management</b>                      |  |                                   |   |
| SASB IF-WM-110b.1                                 | (1) Fleet fuel consumed (GJ), (2) percentage natural gas, (3)percentage renewable  | Gigajoules (GJ), Percentage (%)   | (1) 3,643,188 GJ (2) 0.0% (3) 2.3%  |
| SASB IF-WM-110b.2                                 | Percentage of alternative energy vehicles in fleet   | Percentage (%)                    | Under 1%  |
| <b>Air Quality</b>                                |  |                                   |   |
| SASB IF-WM-120a.1                                 | Air emissions of the following pollutants: NOx (excluding N2O), SOx, non-methane volatile organic compounds (NMVOCs), and hazardous air pollutants (HAPs)  | Metric Tons (t)                   | Air emissions of the following pollutants: (1) NOx – 2,567 t (2) Sox – 5,019 t (3) NMVOCs – 1,181 t (4) HAPs – 713 t  |
| SASB IF-WM-120a.2                                 | Number of facilities in or near areas of dense population  | Number                            | 164 of 480 locations  |
| SASB IF-WM-120a.3                                 | Number of incidents of non-compliance associated with air emissions  | Number                            | 114 Incidents – 74 Air releases from IMS; 21 Odor complaints from IMS, 19 Notice of Violations (NOV's) related to air emissions   |
| <b>Management of Leachate and Hazardous Waste</b> |  |                                   |   |
| SASB IF-WM-150a.1                                 | Total Toxic Release Inventory (TRI) releases, percentage released to water   | "Metric Tons (t); Percentage (%)" | "Total Releases – 11,453 tons, 11,449 tons contained in RCRA facility and 4 tons released to water; Percentage released to water - 0.04%"   |
| SASB IF-WM-150a.2                                 | Number of corrective actions implemented for landfill releases   | Number                            | 1 corrective action   |
| SASB IF-WM-150a.3                                 | Number of incidents of non-compliance associated with environmental impacts  | Number                            | 80  |
| <b>Labor Practices</b>                            |  |                                   |   |
| SASB IF-WM-310a.1                                 | Percentage of active workforce covered under collective bargaining agreements  | Percentage (%)                    | 12% of our North American workforce   |
| SASB IF-WM-310a.2                                 | Number and duration of strikes and lockouts  | Number                            | No strikes or lockouts  |
| <b>Workforce Health and Safety</b>                |  |                                   |   |
| SASB IF-WM-320a.1                                 | (1) Total recordable injury rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees  | Number                            | (1) TRIR - 1.05,<br>(2) Fatality rate - 0.005,<br>(3) NMFR – 5.59 (all employees)   |
| SASB IF-WM-320a.2                                 | Safety Measurement System BASIC percentiles for: (1) Unsafe Driving, (2) Hours-of-Service Compliance, (3) Driver Fitness, (4) Controlled Substances/Alcohol, (5) Vehicle Maintenance, and (6) Hazardous Materials Compliance | Percentage (%)                    | The Federal Motor Carrier Safety Administration (FMCSA) calculates BASIC percentiles for the 12+ Department of Transportation numbers under which Clean Harbors operates. These scores are available to the public at <a href="https://ai.fmcsa.dot.gov/SMS">https://ai.fmcsa.dot.gov/SMS</a> . |
| SASB IF-WM-320a.3                                 | Number of vehicle accidents and incidents  | Number                            | 64 vehicle accidents and incidents  |
| <b>Recycling and Resource Recovery</b>            |  |                                   |   |
| SASB IF-WM-420a.1                                 | Amount of waste incinerated, percentage hazardous, percentage used for energy recovery   | Metric Tons (t)<br>Percentage (%) | Amount of waste Incinerated: 430,928 metric tons, Percentage hazardous: 86%<br>Percentage used for energy recovery: None at this time.  |
| SASB IF-WM-420a.2                                 | Percentage of customers receiving (1) recycling and (2) composting services, by customer type - municipal, commercial, industrial, residential, other  | Percentage (%)                    | (1) municipal - 81%; commercial - 83%; industrial - 78%; residential - 56%; other - 79%<br>(2) Not applicable   |
| SASB IF-WM-420a.3                                 | Amount of material (1) recycled and (2) composted  | Metric tons (t)                   | (1) 1,432,247 t (2) Not applicable  |
| SASB IF-WM-420a.4                                 | Amount of electronic waste collected, percentage recovered through recycling   | Metric tons (t)<br>Percentage (%) | 1,345 t, 100% recovered through recycling   |

## Appendix

### Activity Metrics

| Code             | Activity Metrics   | Unit of Measure | Data, Omission & Explanation (2019)   |
|------------------|--|-----------------|---|
| SASB IF-WM-000.A | Number of customers by category:(1) municipal, (2) commercial, (3) industrial, (4) residential, and (5) other                                  | Number          | (1) municipal - 26,195 (2) commercial - 208,994 (3) industrial - 35,025 (4) residential - 224 (5) other - 1,985   |
| SASB IF-WM-000.B | Vehicle fleet size   | Number          | 8,000 vehicles  |
| SASB IF-WM-000.C | Number of: (1) landfills, (2) transfer stations, (3) recycling centers, (4) composting centers, (5) incinerators, and (6) all other facilities | Number          | Active sites - Number of (1) 11 landfills, (2) 0 transfer stations, (3) 8 Recycle centers – 2 facilities specializing in solvent recovery and 6 oil re-refineries, (4) 0 composting centers, (5) 5 incinerator facilities with 9 incinerators, (6) 456 other facilities including 9 oil accumulation centers, 53 oil terminals, 5 packaging and blending facilities, 18 Treatment, Storage and Disposal facilities, 9 wastewater treatment facilities, 6 fixed lodges, and various service branch and office locations. Our properties are more fully described in Item 2. Properties in the Company's 2019 Form 10-K filing. |
| SASB IF-WM-000.D | Total amount of materials managed, by customer category: (1) municipal, (2) commercial, (3) industrial, (4) residential, and (5) other         | Metric tons (t) | (1) municipal - 232,585 t (2) commercial - 1,959,757 t (3) industrial - 1,187,324 t (4) residential - 1,455 t (5) other - 7,638 t   |



Corporate Headquarters  
42 Longwater Drive  
P.O. Box 9149  
Norwell, MA 02061-9149  
781.792.5000  
800.282.0058

**[sustainability@cleanharbors.com](mailto:sustainability@cleanharbors.com)**

**For more information please visit:  
[cleanharbors.com/sustainability](https://www.cleanharbors.com/sustainability)**



40 Years of Sustainability in Action