# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>INTRODUCTION BACKGROUND</th>
<th>SOCIAL RESPONSIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>Employees</td>
</tr>
<tr>
<td>3</td>
<td>26</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Diversity and Inclusion</td>
</tr>
<tr>
<td>8</td>
<td>31</td>
</tr>
<tr>
<td>Company Values</td>
<td>Hazard/Risk Assessment</td>
</tr>
<tr>
<td>9</td>
<td>32</td>
</tr>
<tr>
<td>Materiality</td>
<td>Training</td>
</tr>
<tr>
<td>13</td>
<td>37</td>
</tr>
<tr>
<td>ECONOMIC INVESTMENT</td>
<td>ENVIRONMENTAL STEWARDSHIP</td>
</tr>
<tr>
<td>Company</td>
<td>38</td>
</tr>
<tr>
<td>16</td>
<td>Internal</td>
</tr>
<tr>
<td>Services Provided</td>
<td>39</td>
</tr>
<tr>
<td>19</td>
<td>External</td>
</tr>
<tr>
<td>Associations and Awards</td>
<td>43</td>
</tr>
<tr>
<td>21</td>
<td>What’s Next</td>
</tr>
<tr>
<td>Financials</td>
<td>53</td>
</tr>
<tr>
<td>23</td>
<td></td>
</tr>
<tr>
<td>Supply Chain</td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
</tr>
<tr>
<td>Community Involvement</td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
</tr>
</tbody>
</table>
INTRODUCTION

BACKGROUND
Introduction

ACTenviro is a California-based corporation founded by Chairman Walter H. (Walt) Singer in March 2000. He named the company Advanced Chemical Transport, Inc., and located its headquarters in San Jose, California.

In 2001, a second branch was opened in the San Diego area. In 2016, the company was rebranded as ACTenviro. ACTenviro has progressively grown and expanded since its inception, which has placed it on the Inc. 5000 list of fastest growing private companies for 10 years and counting. During the past 20 years, ACTenviro expanded its network to 13 facilities across the U.S. Pacific Northwest, West Coast and Southwest. With this expansion, ACTenviro has the capability to mobilize personnel and equipment to perform work nationwide.

ACTenviro is a forward-thinking solution provider, and that principle underlies our sustainable approach to everything we do. Keeping one eye on the future ensures we continually focus on protecting people, promoting health and safeguarding the planet’s natural spaces.

As part of our commitment, we manage our internal operations in ways that are both socially and ecologically responsible. We constantly search for new innovations that will help our customers and our team minimize environmental impact and sustain healthy communities. ACTenviro is ranked in the top 100 recyclers in the United States by Waste Today due to our cutting-edge technologies that divert material away from landfills.
Keeping one eye on the future ensures we continually focus on protecting people, promoting health and safeguarding the planet’s natural spaces.
An Introductory Message
from CEO Tim Smith and Chairman/Founder Walter H. Singer

It is with great pleasure that we present ACTenviro’s 2020 Sustainability Report. ACTenviro is excited about all the sustained success and growth we have experienced during our first 20+ years; this report truly represents the beginning of a new and even more transparent era in our company’s story. We are proud of our commitment to sustainability in all its forms — from economic vibrancy to environmental stewardship to humanistic workforce management to stakeholder engagement — and, thus, we are delighted to share the results of our efforts with you.

2020 was another year of rapid growth for ACTenviro. We finished 2020 approaching $100M in revenue, our highest total ever, and we currently have a projection of growth of around 20% leading into calendar year 2021.
Here are some other notes of interest from the year that was:

- I (Tim Smith) came over from Cascade Environmental, where I was CEO for seven years, and assumed the CEO role at ACTenviro. I have long been involved with ACTenviro as a consultant, and I could not be more excited that the stars aligned and allowed me to play a much more prominent role in shaping ACTenviro’s future. I already felt the future was very bright, and I believe I can help make it even brighter. I have immensely enjoyed working with Walt over the years. I have always learned from him, and I will do everything I can to carry on his vision of surpassing our current customer commitment as we pass the $100 million revenue mark, which we are on track to achieve in 2021.

- We have long upheld safety as the ACTenviro core value that undergirds all others. In 2018, we took an even more proactive step in this regard. After holding a naming contest for a newly branded safety program, our employees chose “proACTive.” The name and spirit of this initiative caught on quickly, galvanizing our company-wide focus on safety — from our techs to upper management to our branch receptionists, and everyone in between. Beyond the proACTive moniker, we fleshed out the program with these five cores: involvement, commitment, accountability, rewards and expectations (I-CARE).

- As a result, in 2020, ACTenviro had the safest year it has ever experienced with a TCIR < 1. The number of recordable injuries decreased by 58% in 2020 compared with 2019.

- We expanded our company operations, investing in three new locations: Denver, Seattle and Sacramento. Further to the expansion, we added a long-planned acquisition in California to help us with the growth of our company: the acquisition of Fremouw Environmental. By integrating Fremouw’s diverse depth of experience in the industrial services and environmental response sectors, ACTenviro will provide our customers with the benefits of even more capabilities, additional service lines, and expanded locations and assets to support even more of their environmental service needs.
Stakeholders

ACTenviro sees its stakeholders as the valued partners they are. Our four most influential stakeholder groups — clients, employees, vendors and government regulatory agencies — have profound effects on both our day-to-day and long-term business practices.

ACTenviro fosters open and honest communication with all four groups, through formal means, such as client and employee surveys, regular Relationship Advancement Plan meetings (RAP Sessions), vendor contract negotiations and applications for permits. Informally, we employ frequent outreach by account managers, operations personnel and executives.

As part of the exceptional service for which we are known, we pride ourselves on responding quickly and fully to all stakeholder feedback — no matter the mechanism by which it is received — and translating that feedback into action and positive changes, where appropriate. We regularly employ concerns and issues raised by our stakeholder groups to determine material areas on which to focus our longer-term strategy, reporting and improvement efforts.

A great example of this is Summit our new customer portal that we developed in 2020. Summit enables our clients access to data collection, tracking documents and invoices.
Our company core values are deeply held and continually realized with all ACTenviro stakeholders.

SAFETY
The foundation of our culture — not a goal, an expectation.

FAMILY
We value it above all else, so we treat each other accordingly.

PROFESSIONALISM
We hold ourselves to the highest standards of conduct.

CUSTOMER COMMITMENT
Always doing the right thing for the long haul.

FORWARD THINKING
Employing innovative solutions for all our stakeholders.
CLIENTS
WE ACT PURPOSEFULLY.

The deepest level of commitment to our customers guides our interactions with those we serve every day. Our dedication to this core value has been rewarded with a 96% customer-retention rate for the past 3 years.

Since 2016, we have administered customer satisfaction surveys to uncover areas of concern to our clients. Each completed survey is shared with a tiger team, which is composed of the account manager, branch manager, regional sales manager or vice president of sales, and vice president of operations. Together, the team plans an appropriate strategy for improvement. The account manager communicates directly to the client our appreciation for the feedback and outlines the steps we will take to ameliorate any concerns they raised.

In addition to surveys, we provide clients with Relationship Advancement Plans (RAPs) that categorize and summarize their spending per quarter, half year or year, depending on the customer’s preference. Beyond financial review, we utilize RAP sessions to educate clients about where their waste is going and, when appropriate, propose alternative, more sustainable solutions. We also see these meetings as prime opportunities to listen to our customers and learn how we can do our jobs better.

We are grateful to our clients for identifying areas in which we may need improvement. The ability to address these areas that are most important to our clients has made us a better and more responsive company.

EMPLOYEES
WE ACT INCLUSIVELY.

Every person who works with us is a member of the ACTenviro family. As such, we go to great lengths to ensure we return employees home safely at the end of each workday.

Our employees are highly trained and educated; they are truly best-in-class. Their satisfaction is of the utmost importance, and our open-door policy encourages employees to meet with supervisors frequently to discuss performance and any issues that may arise.
We currently have more than 500 employees, and are adding to our staff every week. We recognize not everyone is comfortable directly sharing candid feedback. So in 2018, we launched an annual employee satisfaction survey to allow our staff to voice their opinions anonymously. Each question asks employees to state their level of agreement with a positive statement about their job. Topics include compensation level, benefits, career development, recognition and others. We use insights gleaned from year-over-year response comparisons to drive improvements in personnel management. Additionally, we adapt the questions each year to address changes in the evolving workplace.

We are proud to have a 75% employee retention rate, and we are honored that ACTenviro has been voted One of the Best Places to Work by the Business Journals of Silicon Valley, Los Angeles and San Diego. Additionally, Inc. magazine recognized ACTenviro as one of the 50 Best Workplaces in the U.S.
VENDORS

WE ACT PROFESSIONALLY.

Our primary vendor partners are treatment, storage and disposal facilities (TSDFs). They are the final stop in the cradle-to-grave lifecycle of our clients’ waste. We perform our own audits on every TSDF with whom we do business to ensure their safety, compliance with applicable standards, and relative sustainability of waste handling.

Additionally, many TSDFs give regular presentations to ACTenviro to provide updates on evolving capabilities. We see this as an opportunity for our employees to learn about changing aspects of the industry, including sustainable disposal options for our clients. ACTenviro personnel also attend tradeshows and industry events as ways to engage with current and prospective vendors and other stakeholders.

We choose to work with only the very best facilities — those that are the safest, and the most sustainability-focused within our regions.

REGULATORS

WE ACT PROACTIVELY.

We work in a heavily regulated industry and adhere to numerous state and federal regulations governing remediation, storage, collection, identification, handling, packaging, documentation, transport, transfer and disposal of hazardous waste. To consistently maintain full compliance, ACTenviro experts interpret and internalize relevant regulations and apply them to our standard business processes. A critical success factor for regulatory compliance is keeping our workforce well-informed and well-trained, so they understand the core requirements of regulations and their impact on our daily work. Inspections for environmental and permit compliance occur frequently, pursuant to permit and regulatory requirements. We consistently receive positive feedback on our compliance with applicable regulations from regulators and customers, alike.

ACTenviro business activities require compliance with hazardous waste and environmental regulations, as well as hazardous materials transportation and workplace safety regulations. ACTenviro regularly interacts with representatives from the Environmental Protection Agency (EPA), Department of Transportation (DOT), Occupational Safety and Health Administration (OSHA) as well as state-level representatives or enforcement authorities from each of these agencies and entities for each state we do business in. Additional details and specific metrics are included later in this report.
Materiality

ECONOMIC INVESTMENT

ACTenviro is committed to significant growth in the coming years, and we plan to grow in a financially responsible manner. This affects all ACTenviro stakeholders — a strong financial position allows us to invest in employees, equipment and business systems to meet the needs of our customers, work with vendors from a position of financial strength and achieve our sustainability goals.

Sustainability indicators related to economic investment are organized into the following areas:

- **Company**: Information on ACTenviro as a company, including services provided, markets served and location of operations, as well as the scale of operations, and the values and principles that contribute to our success.
- **Financial**: Information on our business performance, including economic investment, capital investment, and recent financial performance.
- **Supply Chain**: A review of supply-chain issues, as they relate to the ACTenviro sustainability program. This includes a description of the ACTenviro supply chain, environmental impacts associated with vendors, and our efforts to mitigate potential negative environmental impacts.
- **Community Involvement**: ACTenviro’s role in our local communities and how we give back.
SOCIAL RESPONSIBILITY

Social responsibility informs all business practices at ACTenviro. Our core values include an expectation of safety, a commitment to the highest standards of ethics and professional conduct, and decision-making that adds long-term benefit.

The success of our business depends on attracting and keeping a talented and motivated workforce. Our clients increasingly expect the business practices of their vendors to meet changing standards for social engagement.

At ACTenviro, social responsibility includes the programs we use to attract and retain our highly skilled workers, as well as the processes and procedures we have in place to perform work with hazardous materials and hazardous waste safely and in compliance with all applicable regulations.

Sustainability indicators related to economic investment are organized into the following areas:

- **Social**: Information on our workforce, including the number of employees at our locations and applicable benefits, as well as how we promote workplace safety.
- **Diversity**: Information on our highly diverse workforce, as well as programs in place to promote further diversity in our workforce and among our company leaders.
- **Hazard/Risk Assessment**: A review of practices we use to assess potential occupational health threats associated with ACTenviro work activities.
- **Regulatory Compliance**: A description of programs in place to comply with workplace safety and environmental compliance regulations, and protect our workers and our workplaces; the regulatory compliance activities associated with hazardous waste, medical waste and universal waste management; and fleet actions associated with our business activities.
- **Health and Safety**: A review of our workplace safety program, including procedures to identify hazards and manage risks associated with work activities. Includes information on illness and injury performance, accident and injury rates, and workers’ compensation experience modification.
- **Training**: Information on the ACTenviro workplace safety training program, including training methods, topics covered and amount of training provided.
ENVIRONMENTAL STEWARDSHIP

Environmental stewardship describes potential environmental impacts from ACTenviro business activities (primarily fleet operations), as well as an evaluation of the environmental benefits of our waste management activities.

Our customers rely on us to help them manage the impacts of their activities in a safe manner that minimizes their environmental impact through recycling, reuse and other sustainable disposal options in a cost-effective manner that meets all applicable regulatory requirements.

Stewardship also includes emergency planning and business continuity measures. As with all businesses, our corporate resiliency and ability to manage unexpected business circumstances were tested in 2020 due to the impact of the COVID-19 pandemic.

Sustainability indicators related to environmental stewardship are organized into the following areas:

- **Environmental Impacts**: An evaluation of impact of ACTenviro fleet and other business activities with respect to miles driven, fuel usage and estimated greenhouse gas impact, broken down by location and type of waste.
- **Environmental Benefits**: A review of ACTenviro waste management services, including different types of wastes and management options, such as recycling and reuse.
- **Emergency Preparedness and Business Continuity**: Measures in place to respond to business emergencies and to adapt to changing business conditions, including COVID-19 protection measures that significantly affected business activities in 2020.
Company

NAME OF ORGANIZATION
Advanced Chemical Transport, Inc. (dba ACTenviro)

LOCATION OF HQ
967 Mabury Rd.
San Jose, CA 95133
Phone: (408) 548-5050
Fax: (408) 548-5052

24-Hour Emergency Hotline: 1-866-348-2800
Email: info@ACTenviro.com
Website: www.actenviro.com

OUR EXECUTIVE MANAGEMENT TEAM (EMT)
Walter Singer, Founder/Chair*
Tim Smith, CEO*
Tyler Kopet, CFO*
Shawn Ball, Vice President of Sales*
Todd Marti, Vice President of Operations*

* represents ACTenviro shareholder

CORPORATE PERSONNEL
Pasquale M. Paduano, Vice President of TSDF and Fleet
Krista Wood Harsono, Director of Compliance
Aditi Khajuria, Corporate Controller & Manager of Finance
Kathy Hewett, Director of Human Resources
James Moore, Director of IT
Jennifer Diamond, Director of Marketing
Nick DeLeon, Corporate Materials Manager

REGIONAL SALES MANAGERS
Steven Terwiske
Mariana Sabich
Spencer Pfaff
Bruce Wescott
Jeff Tanka

REGIONAL OPERATIONS MANAGERS
Jessica Drake
Jeff Ruhl
Frank Sanchez
Doug Roundtree
Paul Atkinson
Fernando Montes
Henry Desousa
Keo Chen
Tim Berrens
Jody McKnight
Carlos Uribe
VALUES, PRINCIPLES, STANDARDS AND NORMS

ACTenviro is an employee-owned organization built on quality service and investment in our people. We act with our deeply held core values: Safety, Family, Professionalism, Customer Commitment, Forward Thinking.

During the past decade, ACTenviro has garnered numerous awards. We’ve been voted “One of the Best Places to Work” and one of “The Fastest Growing Companies” by the Business Journals of Silicon Valley, Los Angeles, and San Diego. Recently, Inc. magazine recognized ACTenviro as one of the “50 Best Workplaces in the U.S.” We’ve consistently been ranked in the Top 50 Best Workplaces in the U.S. for 10 years running — a distinction only 1% of companies included have achieved. And we were highly honored by Waste360 as one of the top 100 companies in the country, ranked for the processing of recyclables, and by Waste Today as one of the top 50 haulers in the U.S.

Through our commitment to safety, we received a very significant award from the State Compensation Insurance Fund for performing work safely with a loss percentage of less than 1% — well below industry standard.

There is nothing more important in the environmental services industry than a commitment to sustainability in all of its forms. We specialize in providing advanced recycling and disposal technologies and strive to offer reuse and recycling for liquid/solid fuels or recapturing of metals prior to offering treatment, incineration, and/or landfill and stabilization options for disposal.

ECONOMIC INVESTMENT

There is nothing more important in the environmental services industry than a commitment to sustainability in all of its forms.

For more than 21 years, we have experienced steady expansion of revenues, services, and geographic service areas. With an extensive selection of service lines and facilities throughout the western U.S., ACTenviro is committed to meet all of our customers’ needs through extraordinary service at a great value.

ACTenviro focuses on hazardous waste management (HWM) with professional and highly trained staff (all 40-hour HAZWOPER trained and certified) with more than 21 years of experience in the hazardous materials/waste management industry. We adhere strictly to all state and federal regulations surrounding hazardous, universal, medical, bio-hazardous, radioactive, laboratory, household hazardous waste (regulated and non-regulated) and DWI waste management services.

Our employee-retention rate for 2020 is 75%, achieved by putting an emphasis on employee satisfaction and by encouraging forward-thinking ideas which creates innovation in the workplace and in service of our customers. This leads to company growth and differentiation, allowing us to exceed customer goals and expectations.
Services Provided

Since our inception in 2000, ACTenviro has been involved with the management (collection, segregation, consolidation, packaging, labeling, transporting and disposing) of hazardous waste materials for organizations, including Fortune 500 companies, small waste generators, and federal, state and local governments.

ACTenviro has expanded through organic growth and acquisitions, including one fully permitted (Part B RCRA) treatment, storage and disposal facility (TSDF) at 6133 Edith Blvd. N.E., Albuquerque, NM 87107.

ACTenviro offers expert and cost-effective routing from our 13 10-day transfer stations throughout the West to our ABQ TSDF in Albuquerque. When waste cannot be processed at our TSDF, we utilize select reputable final-destination facilities for the recycling, fuel blending, treatment, incineration and/or disposal of a wide range of hazardous wastes. Owning one TSDF allows us to “shop” for best pricing from our downstream TSDF partners and negotiate the best cost (as a broker would) for our customers. ACTenviro owns a fleet of trucks, vans, semi-trailers, roll-off containers, rocket launchers and vacuum tankers to transport our customers’ waste. All vehicles are fully compliant with federal and state DOT and EPA regulations.

ACTenviro’s full lines of service include:

- Hazardous, non-hazardous, bio-waste, universal and e-waste transportation and disposal services
- Laboratory pack services
- Chemical moves
- Hazardous waste management expertise
- On-site services (full-time and part-time staff for waste management and project work)
- Emergency response services
- Compliance inspections
- Bulking/waste reduction
- HAZ MAT transportation (on- and off-site)
- Medical waste treatment
- Universal waste management
- Recycling and reuse options
- Program management
- Decontamination, demolition, decommissioning
- Chemical hood certification
- Closure support
- Analytical / sampling
- Support customized programs
- Industrial services
- EH&S consulting and rating
- Chemical inventory (CERS)
- DOT/IATA dangerous goods
- COVID-19 decontamination/disinfecting services
- Confined space entry
- Remediation services
- Recovery services
- Customized environmental program
LOCATION OF OPERATIONS

San Jose (Headquarters)
967 Mabury Road, San Jose, CA 95133
(408) 548-5050  (866) 333-9222 Toll Free

Central Valley
265 Riggs Avenue, Merced, CA 95341
(209) 722-4288

Los Angeles
13722 Carmenita Road, Santa Fe Springs, CA 90670
(714) 545-2191

Inland Empire/Redlands
600 Iowa Street, Redlands, CA 92373
(909) 406-4400

San Diego
2010 W. Mission Road, Escondido, CA 92029
(760) 489-5600

Dixon
6940 Tremont Road, Dixon, CA 95620
(000) 000-0000

Phoenix
6212 S 75th Ave. #4, Laveen Village, AZ 85339
(602) 842-9160

Albuquerque
203 Murray Road SE, Albuquerque, NM 87105
(505) 349-5220

ACT Treatment (TSDF)
6137 Edith Blvd. NE, Albuquerque, NM 87107
(505) 349-5220

Chaparral
511 Highway 213, Chaparral, NM 88081
(575) 824-0164

Portland
13600 SE Ambler Road, Clackamas, OR 97015
(971) 279-6780

Seattle
24602 Pacific Hwy S, Kent, WA 98032
(000) 000-0000

From our 12 locations we cover the western United States from Texas to the entire west coast.
Associations and Awards

- Inc. magazine 50 Best Workplaces in the United States, 2017
- Sunnyvale Silicon Valley Chamber of Commerce 2017 Award for Sustainability and Innovation in Hazardous Medical Waste Technology
- Los Angeles Best Places to Work 2016, #2 in size category
- Bay Area Best Places to Work 2016, #3 in size category
- Waste 360 Top Recyclers in 2016, ACTenviro has made this list for 4 years
- San Diego & Los Angeles Best Places to Work 2015
- Best of Sunnyvale - Environmental Consultant 2015
ENVIRONMENTAL FLEET

ACTenviro recently invested in hybrid waste hauling vehicles. In addition, we have implemented a policy of purchasing low-resistance tires for our fleet and installed belly wings on our trailers in an effort to maximize fuel efficiency and reduce the associated carbon footprint.

These activities illustrate our commitment to, and investment in, sustainability and minimization of the use of resources, including fossil fuels. ACTenviro will continue to look for additional ways to offer sustainable solutions both within our organization and externally.

OPERATIONS

ACTenviro operations utilize sophisticated resource-allocation tools to effectively ensure the best team and appropriate equipment, supplies and materials are allocated in real time. We use this system as a forecasting tool, and we crosscheck on a daily basis, comparing against new projects and existing customer needs. Our project planning software allows us to look across projects and track multiple resources in close geographic proximity to provide confident scheduling of projects based on existing capacity, as well as solid forecasts for our project and routine business pipeline of activities. This ensures, for all customers and pieces of business, we have the proper distribution, share and allotment of services we have been contracted to provide.
Financials

FINANCIAL INVESTMENT

ACTenviro’s executive management team retains a pulse on the market for top-notch acquisitions, mergers and purchase opportunities that add value from future assets and partnerships of supplies/materials, equipment, high-quality people, software and technology that would benefit our portfolio of environmental services.

ACTenviro is a multi-million-dollar positive-cash-flow company. Historically, ACTenviro has grown safely, compliantly and carefully, so we can demonstrate to our shareholders and stakeholders positive cash flow while diversifying and adding resources. This balanced approach takes into account our company growth objectives while continuing to grow operations throughout the western United States and into the Gulf Coast region. Our future lies in continuing to expand toward the eastern United States with a target date of 2022.

FINANCIAL PERFORMANCE

ACTenviro has been privately financed, and successful in revenue, asset, and profit growth through our aggressive expansion in both product lines and geographic territories.

• Sales have grown from just $400,000 in 2000, our first year of business, to revenue forecast of $125,000,000 in 2021.
• Long-term budgets and forecasts are showing a sustained 18% growth rate year over year. ACTenviro is currently making profits at, or above, industry standards.
• Assets have grown from $147,000 at inception to more than $99 million in 20 years.
• ACTenviro pays its vendors within 30–60 days and will share our financial records upon request. There are no current liens, bankruptcies, judgments or litigation within the past five years.
Supply Chain

The hazardous waste supply chain consists of a contractor, or hazardous waste broker, such as ACTenviro, collecting hazardous waste from generators and transporting the waste to vendor facilities (“treatment, storage & disposal” or TSD facilities) for treatment and disposal.

These vendor TSD facilities use different technologies to manage waste. A key business service provided by ACTenviro to our clients who generate hazardous wastes is the ability to choose between different TSD facilities that offer different treatment options at different price points and with different logistical considerations and long-term environmental liabilities.

As of 12/31/2020, ACTenviro had 75 approved TSD outlets with several additional outlets being reviewed. All TSDs used for waste disposal by ACTenviro must complete a rigorous screening process.

ACTenviro completes environmental health and safety audits as a systematic and documented process to objectively review our end disposal facilities to ensure they are meeting environmental health and safety requirements. All TSD are screened and audited to confirm they possess required permits and insurance and to ensure TSD operations are conducted in compliance with their permits. ACTenviro has developed an audit checklist that covers compliance with environmental requirements, evaluating management systems and assessing risks from regulated and unregulated materials and practices. The frequency of our audit is based on annual spend:

- Annual Audit: $350,000 and up
- Every Two Years: $100,000 - $350,000
- Every Three Years: $25,000 - $100,000
- Desk Audit (reviewed every four years): < $25,000

If no formal enforcement action exists in the last five years an update can be done every other audit period.
Community Involvement

We comply with stringent environmental protection regulations and requirements to prevent any environmental harm associated with our business activities.

Our workforce is primarily recruited from the communities where our branches are located, and each branch is actively involved in local communities.

- All ACTenviro branches support fundraising activities throughout the year, including thanksgiving food drives, holiday gift drives and community clean-up events.
- ACTenviro employees are socially active, supporting a variety of causes and participating in a wide variety of community development activities including fundraisers and direct donation, volunteer activities, supporting school programs, community and environmental projects and religious activities, arts and cultural activities as well as youth programs.
- Employee community involvement is encouraged at the corporate level through time off and financial support.
Employees

FAMILY

At ACTenviro, our people are our most important asset. “Family” is one of our core values, and we treat each other accordingly. We want to treat our work family in such a way that they are set up for success across every aspect of their lives, at work and beyond.

During the past decade, ACTenviro has been voted “One of the Best Places to Work” and one of “The Fastest Growing Companies” by the Business Journals of Silicon Valley, Los Angeles and San Diego. Inc. magazine recently recognized ACTenviro as one of the “50 Best Workplaces in the U.S.”

RECRUITMENT AND RETENTION

We have an impressive employee-retention rate of more than 75%. We achieve this through a combination of proactive and reactive measures. While we rely quite a bit on our current employees to find out what makes ACTenviro a great place to work, we know the talent market evolves quickly, so we try to move quickly to make necessary changes to evolve accordingly.
In 2018, we began an initiative to refocus on the qualities and competencies that make a successful employee and began interviewing for these traits, rather than simply looking for skills. Additionally, we began including our core values of safety, family, professionalism, customer commitment and forward thinking in interview questions, which has increased the likelihood of finding candidates who have a good values match with our philosophy.

In 2019, we began implementing a more robust mentorship program for all new hires and promoted employees. This program, called MaTCH (Mentoring and Teaching Crucial Hires), pairs seasoned tenured employees with new hires, those recently promoted or those who would benefit from mentoring. This has proved to be a powerful tool to help our employees adapt to the changing environment, as well as to augment their growth and development.

From 2019 to 2020, our employee turnover rate decreased by 2.31% overall and by 5.8% for voluntary departures. Beginning in 2021, we implemented an exit survey to help us better understand the factors contributing to turnover, and we plan to track both tenure and reasons.

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<td>Avg. # of Employees</td>
<td>390</td>
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<td>424</td>
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From 2019 to 2020, turnover rate decreased by 2.31%.

**RECOGNITION AND REVIEWS**

While each of ACTenviro's branches inevitably has its own personality, due to variations in local custom and demographics, our strong company culture unites all employees. In turn, management makes sure to devote appropriate time and energy to each branch.

When it comes to performance reviews, ACTenviro follows a traditional annual path. However, employees receive feedback consistently throughout the year to stay on track with goals and development plans, which makes the annual review more of a new-year goal-setting exercise than a look back at the past. The annual review is focused primarily on setting HARD (Heartfelt, Animated, Required and Difficult) goals for each employee to work toward during the coming year. These goals are decided on by the employee and the supervisor, together. They are designed to help the employee grow by ensuring they fit the passion of the employee and are not easily achievable. This, in turn, encourages growth and development to help increase the rate of career advancement. Additionally, with our mentorship program and check-in meetings among employees, mentors and supervisors, each employee receives continual feedback to aid in learning and development.
BENEFITS AND COMPENSATION

ACTenviro prides itself on offering top-level benefits to all employees while, simultaneously, keeping costs low. In fact, in a benchmarking exercise comparing our benefits to those of other companies in our industry, we were recognized for being in the top 2% among industry peers. That said, we are always looking to improve our benefits and perks. 87% of our employees are covered under our healthcare-insurance program.

ACTenviro is flexible, in that we continually find ways to help employees with perks and benefits they consider most useful. We ascertain this information by asking our employees what they want. This is how our unlimited vacation time, gym membership reimbursement and tuition reimbursement benefits have come into existence.

In 2020, we were faced with a significant increase in the cost of benefits. Instead of passing that cost on to our employees, we changed our strategy. In most cases, we reduced the premiums employees have to pay, while enriching their benefits at the same time.

We offer a competitive benefit package for all full-time employees, including:

- Medical insurance
- Dental insurance
- Vision insurance
- Flexible spending accounts
- Short-term and long-term disability insurance
- Life and accidental death and dismemberment insurance
- Bereavement leave
- Jury duty leave
- Education and license assistance
- Paid vacation and sick leave
- Military leave
- Employer-sponsored health reimbursement accounts
- Direct deposit
- 401(k) retirement plan with company match
- Gym membership reimbursement
- Employee assistance program
Our 401(k) plan offers a generous match of the employees' contribution, to help employees build a secure retirement. Our automatic deferral plan is simple and convenient. It helped spur a 2020 level of employee participation of nearly 89%, a 3% increase year over year.

We offer a free and confidential 24/7 Employee Assistance Program (EAP) to help employees and their dependents living in the same household. The EAP helps with a variety of mental-health issues, relationship problems, parenting concerns, caring for aging parents, grief, drug and alcohol issues, and more.

### Employee 401(k) Retirement Participation

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average employee deferral</td>
<td>4.50%</td>
<td>5.60%</td>
</tr>
<tr>
<td>Total Employer Contribution</td>
<td>$607K</td>
<td>$755K</td>
</tr>
<tr>
<td>Total 401(k) plan assets for 401(k)</td>
<td>$13.4M</td>
<td>$18.6M</td>
</tr>
<tr>
<td>Total 401(k) employee contributions</td>
<td>$1.79M</td>
<td>$2.1M</td>
</tr>
<tr>
<td>Employee participation in 401(k) retirement Plan</td>
<td>85.74%</td>
<td>88.74%</td>
</tr>
</tbody>
</table>

### Employees covered under our healthcare insurance program

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees covered under our healthcare insurance program</td>
<td>367</td>
<td>366</td>
</tr>
<tr>
<td>% of employees covered under our healthcare insurance program</td>
<td>87%</td>
<td>87%</td>
</tr>
</tbody>
</table>
Diversity and Inclusion

Bringing people of diverse backgrounds and cultures together in ACTenviro makes us stronger by creating an environment in which we can all learn and see things from different perspectives. We have a fairly diverse workforce that reflects the demographics of the different geographic locations in which we do business.

INFORMATION ON EMPLOYEES

ACTenviro tracks diversity categories through the standard process of filing annual EEO-1 reports. EEO-1 reporting includes ethnicity, gender and position levels, to which we add age, tenure and veteran status. ACTenviro is an equal opportunity employer and takes pride in respecting all cultures and backgrounds in our hiring and daily work environment.

While the majority of ACTenviro employees are between the ages of 30 and 50, the number of employees 50 and older increased by 3.6% from 2019 to 2020.

The ACTenviro workforce is approximately 78% male and 22% female. This has been consistent in recent years.

<table>
<thead>
<tr>
<th>Category</th>
<th># Minority 2019</th>
<th>% Minority 2019</th>
<th>2019</th>
<th>% Minority 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive and Senior Management</td>
<td>1</td>
<td>0.24%</td>
<td>1</td>
<td>0.24%</td>
</tr>
<tr>
<td>First and Mid-Level Management</td>
<td>16</td>
<td>3.80%</td>
<td>16</td>
<td>3.77%</td>
</tr>
<tr>
<td>Professionals</td>
<td>16</td>
<td>3.80%</td>
<td>17</td>
<td>4.00%</td>
</tr>
<tr>
<td>Technicians</td>
<td>9</td>
<td>2.13%</td>
<td>10</td>
<td>2.40%</td>
</tr>
<tr>
<td>Sales Force</td>
<td>8</td>
<td>1.90%</td>
<td>8</td>
<td>1.88%</td>
</tr>
<tr>
<td>Administrative Support</td>
<td>41</td>
<td>9.98%</td>
<td>39</td>
<td>9.20%</td>
</tr>
<tr>
<td>Craft Workers - Skilled</td>
<td>9</td>
<td>2.13%</td>
<td>14</td>
<td>3.30%</td>
</tr>
<tr>
<td>Operatives - Semi-Skilled</td>
<td>141</td>
<td>33.49%</td>
<td>143</td>
<td>33.73%</td>
</tr>
<tr>
<td>Laborers and Helpers</td>
<td>12</td>
<td>2.85%</td>
<td>9</td>
<td>2.12%</td>
</tr>
<tr>
<td><strong>Overall</strong></td>
<td><strong>253</strong></td>
<td><strong>60.1</strong></td>
<td><strong>257</strong></td>
<td><strong>60.61%</strong></td>
</tr>
</tbody>
</table>

Nearly two-thirds of ACTenviro’s workforce is composed of ethnic minorities. The total number of minority employees increased slightly from 2019 to 2020.
Incidents of Discrimination and Investigation Processes

While we had no reported incidents of discrimination between 2018 and 2020, ACTenviro has extensive procedures and policies for handling any discrimination complaints that could arise.

Our HR team begins its investigation by sitting down with the employee who is making the complaint. We offer compassion, understanding and respect to the individual at all times. We interview and take notes on the complaint and ask the employee to provide a written statement. We inform the employee that we will try to keep as much of the information confidential as possible during our investigation.

We then formulate a strategy for the investigation. In each of our interviews, we remind employees that retaliation is strictly prohibited and to keep information confidential, so we can carry out the remainder of the investigation. Upon completion of an investigation, we work together to come to a conclusion and a plan for moving forward.

Finally, we follow up with those involved in the investigation and close it out accordingly. We also follow up with training on discrimination topics for the office location experiencing the complaint.

Hazard/Risk Assessment

ACTenviro is committed to promoting a culture of health by identifying and controlling potential stressors in the workplace that impact health as our employees are the most important part of our company.

We monitor our employees based on their potential exposure to chemical and physical hazards in the workplace.

ACTenviro maintains a rigorous medical surveillance program for all field employees (ACTenviro personnel who handle hazardous waste or hazardous materials or are potentially exposed to hazardous waste and hazardous materials) including pre-employment physicals, HAZWOPER/fit for duty physicals for current workers and DOT physicals for Commercial Drivers.

Physicals and medical surveillance include blood work, audiograms, pulmonary function test and other tests, as determined by the physician.

Clinical services for illnesses and injuries are available to all employees and some of our preventive programs are summarized below.
Regulatory Compliance

ACTenviro is subject to numerous state and federal regulations governing remediation, storage, collection, identification, handling, packaging, documentation, transport, transfer and disposal of hazardous waste. To maintain full compliance, ACTenviro continually evaluates aspects of regulatory risk during regular business interactions. ACTenviro’s operations are affected by state and local laws and ACTenviro has made (and plans to continue making) necessary expenditures for compliance with applicable laws.

A critical success factor for regulatory compliance is keeping our workforce well trained, so that they understand the core requirements of a regulation and its impact on their daily work.

Inspections for environmental and permit compliance occur on a frequent basis pursuant to permit and regulatory requirements.

Consistently positive comments on compliance with applicable regulations have been received from regulators and customers alike.

Our entire Environmental, Health, and Safety (EH&S) consulting team and field staff stay abreast of industry trends and regulatory updates through participation in industry and trade associations, an extensive network of professional connections, and frequent, close interaction with representatives of the EPA, DTSC, DOT, CDPH and local CUPAs.

### Regulatory Compliance

<table>
<thead>
<tr>
<th>Service</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Employment Physical</td>
<td>55</td>
</tr>
<tr>
<td>HAZWOPER / Fit-for Duty Physical</td>
<td>269</td>
</tr>
<tr>
<td>Respirator Physical</td>
<td>347</td>
</tr>
</tbody>
</table>

2020 Occupational Health Services Totals

We screen for early signs of occupational illnesses to protect workers from further exposure, and we provide medical management.

We look for trends in the health data of working populations to assure that potential hazards are well controlled.

While many of these programs are mandated by government requirements, others are established to meet ACTenviro’s more protective standards. This includes:

- HAZWOPER (fitness for duty physicals)
- Blood work
- Audiogram
- Pulmonary Function Test
- DOT Physicals for Commercial Drivers

ACTenviro’s Record Retention Policy defines the rules that must be followed to protect workers’ medical information. This standard assures that medical information is handled in a manner consistent with all applicable legal requirements.
H&S

In order to protect our employees, the environment, our property and the property of our customers we must be committed to providing a safe and healthy working environment, promote an on-going reduction of risks at our operating sites, and endorse continuous improvements in minimizing our environmental impacts to human health and the environment.

Our proACTive safety program creates an avenue for a self-sustaining safety commitment and management system in which participation and success can be measured at every level in the organization. proACTive is supported and maintained by the following core principles (I-CARE):

1. Its message is driven by a high level of Involvement
2. Commitment from everyone ensures the success of the program and, by extension, the company
3. Day-to-day personal Accountability and Rewarding safe behavior
4. High Expectations are the key to everything

ACTenviro’s Safety and Health Policy applies to ACTenviro operations everywhere, including new acquisitions. Hazards in ACTenviro’s workplaces must be well understood and effectively managed to protect ACTenviro employees, visitors, sites, and surrounding communities. In addition, we continue to evaluate opportunities to raise our safety and health standards. We visit sites to identify and manage environmental, health, and safety (EHS) risks; evaluate compliance with regulatory requirements and conformance to ACTenviro policies and standards; identify opportunities for continuous improvement; and share exemplary practices both internally and externally. To assure consistent reporting and metrics, ACTenviro follows the U.S. Occupational Safety and Health Administration (OSHA) recordkeeping rules and formulas to record and measure injury and illness rates. At all locations, ACTenviro employees are covered by our injury and illness recordkeeping rules.

Developing and implementing policies, management systems, and key performance metrics enable ACTenviro to continually integrate and drive continuous improvement, assuring consistency and innovative thinking. ACTenviro uses a variety of tools to manage EHS risks in the workplace. We have successfully used specialized tools for several years in the areas of environmental compliance, life safety, industrial hygiene, and ergonomics. Each of these disciplines uses a risk management approach to categorize risk levels and define appropriate levels of control, frequently above and beyond compliance. Live dashboards report EHS data at each branch and corporate levels. Dashboards are reviewed by executive management for performance on selected indicators, enabling ACTenviro to monitor and identify successes, risks, and opportunities for performance improvements.
ACTenviro has increased focus on the injury type (both first aid and recordable over a 12-month period) which has allowed us to determine that year over year our #1 type of injury has been due to sprains and strains. With this knowledge we have focused on the body part affected and implemented additional engineering and work practice controls to reduce the frequency and severity.

All ACTenviro sites are required to internally report actual and potential incidents (i.e., identify risks) which mostly occur through the cloud-based Spotlight reporting tool. Actual and potential incidents include, but are not limited to, injury or illness, fire or explosion, environmental exceedances, spills, agency notices, and fines.

The accident statistics tracked by ACTenviro cover occupational accidents and the lost workdays caused by them. They also facilitate an evaluation by age, tenure with ACTenviro, body part and injury type.

ACTenviro’s Total Case Incident Rate (TCIR) and Days Away Restricted Duty (DART) has generally decreased year over year. In 2020, ACTenviro had the safest year it has ever experienced with a TCIR < 1 and a Lost Time Incident Rate (LTIR) of 0. The number of recordable injuries decreased by 58% in 2020 compared with 2019 and the level of injuries that led to restricted duty decreased by 69% in 2020 compared with 2019 and ACTenviro did not have any lost time in 2020.

<table>
<thead>
<tr>
<th>Year</th>
<th>Hours Worked</th>
<th>TCIR</th>
<th>DART</th>
<th>LTIR</th>
<th>Fatalities</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td>57,482.68</td>
<td>4.87</td>
<td>4.18</td>
<td>0.35</td>
<td>0</td>
</tr>
<tr>
<td>2017</td>
<td>678,869.75</td>
<td>2.36</td>
<td>1.47</td>
<td>0.29</td>
<td>0</td>
</tr>
<tr>
<td>2018</td>
<td>809,337.40</td>
<td>2.22</td>
<td>1.98</td>
<td>0.25</td>
<td>0</td>
</tr>
<tr>
<td>2019</td>
<td>841,841.17</td>
<td>2.14</td>
<td>0.71</td>
<td>0.48</td>
<td>0</td>
</tr>
<tr>
<td>2020</td>
<td>901,509.79</td>
<td>0.89</td>
<td>0.22</td>
<td>0.00</td>
<td>0</td>
</tr>
</tbody>
</table>
ACTenviro has plans and processes in place to help prevent and prepare for, respond to, and recover from serious, severe, and crisis situations throughout our nationwide footprint. Notification and communication processes inform and engage response teams, leadership, and subject matter experts. When a significant EHS event or security threat arises, a message informs workers and provides a response mechanism to confirm their well-being after a severe or catastrophic event. ACTenviro’s Executive Team provides leadership, coordination, and direction in crisis situations.

We investigate incidents and aim to learn from them, sharing findings to improve safety performance across our organization and our industry.

ACTenviro has plans and processes in place to help prevent and prepare for, respond to, and recover from serious, severe, and crisis situations throughout our nationwide footprint. Notification and communication processes inform and engage response teams, leadership, and subject matter experts. When a significant EHS event or security threat arises, a message informs workers and provides a response mechanism to confirm their well-being after a severe or catastrophic event. ACTenviro’s Executive Team provides leadership, coordination, and direction in crisis situations.

12-Month Rolling Summary Injury by Type
First Aid & Recordable

- 27% Strain/Strain
- 13% Burn
- 13% Cut/Laceration/Puncture
- 13% Pain
- 7% Contusion
- 7% Crush
- 7% Bruise
- 6% Chemical Exposure
- 7% Needlestick

13% Burn
13% Cut/Laceration/Puncture
13% Pain
13% Contusion
7% Crush
7% Bruise
6% Chemical Exposure
7% Needlestick
27% Strain/Strain
Training

Every employee receives job-specific and safety training throughout his or her tenure at ACTenviro. Safety training is conducted weekly and job-specific training is provided periodically, on an as-needed basis.

We are always looking to offer growth and development opportunities to our employees. By offering career-pathing guidance and setting up parameters around every position in our company, we highlight areas in which employees can gain new skills and knowledge. We then provide the training needed to help employees develop the skills necessary for the long-term roles into which they strive to ascend.

A description of any occupational health and safety training is provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.

Our learning orientation and philosophy focus on experiential learning and skill-building rather than classroom-style training. The number of training hours and the training cost per employee are not our leading indicators. Instead, when assessing our programs, we focus on indicators that align employees’ results to the company’s success. Leadership and employee engagement, and employee retention rates, are a few examples of indicators that contribute to our success. ACTenviro has prioritized learning and career development opportunities not only for leaders but for all employees. Employees have the freedom to create meaningful development plans, identify goals, and take steps to achieve them. ACTenviro and supervisors provide the tools to help them achieve those goals.

Our goal is to have 100% of employees engaging in development activities. With our new Learning Management System (LMS), employees are easily able to access development resources to support their career aspirations and advance their skills and capabilities within ACTenviro. Our LMS provides employees with a personalized experience by recommending relevant content based on previous training and requests. Additionally, content is organized and aligned to directly support our priorities. Our LMS provides access to thousands of learning resources in multiple languages, allowing ACTenviro to engage in employee development.

At ACTenviro, learning and experiences are shared as we share and combine our knowledge through mentorship. We define mentoring as a unique relationship in which a mentor (a more experienced person) helps a mentee (a less experienced person) with their development in a particular area.
ENVIRONMENTAL STEWARDSHIP
TRANSPORTATION-RELATED IMPACTS

Hazardous waste disposal services provided by ACTenviro deliver environmental and sustainability benefits to our customers. While we strive to minimize them, there are environmental impacts associated with these business activities, such as use of fuel (gasoline, diesel), motor oil and other chemicals, as well as associated greenhouse gas emissions.

The number of motor vehicles and trailers vehicles in the ACTenviro fleet has increased by 34% since 2018, for a current total of 727 pieces of equipment.

2020 Fleet of Vehicles

<table>
<thead>
<tr>
<th>Motor Vehicles</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bobtail Class B</td>
<td>22</td>
</tr>
<tr>
<td>Bobtail Class C</td>
<td>48</td>
</tr>
<tr>
<td>Roll off Trucks</td>
<td>7</td>
</tr>
<tr>
<td>Pickup Trucks</td>
<td>57</td>
</tr>
<tr>
<td>Service Trucks</td>
<td>3</td>
</tr>
<tr>
<td>Vans</td>
<td>7</td>
</tr>
<tr>
<td>Stack Beds</td>
<td>4</td>
</tr>
<tr>
<td>Tractors</td>
<td>45</td>
</tr>
<tr>
<td>Vac Trucks</td>
<td>4</td>
</tr>
<tr>
<td>Tanker Trailer</td>
<td>15</td>
</tr>
<tr>
<td><strong>Total Vehicles</strong></td>
<td><strong>212</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trailers</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment Trailer</td>
<td>8</td>
</tr>
<tr>
<td>Dry Box Trailer</td>
<td>97</td>
</tr>
<tr>
<td>Roll Off Bins</td>
<td></td>
</tr>
<tr>
<td>10 Yard</td>
<td>10</td>
</tr>
<tr>
<td>20 Yard</td>
<td>90</td>
</tr>
<tr>
<td>40 Yard</td>
<td>555</td>
</tr>
<tr>
<td>Round-bottom bins</td>
<td>31</td>
</tr>
</tbody>
</table>
We expect to spend more than $2 million on new vehicles in 2021 to support our growth and replace older, less fuel-efficient vehicles. This expansion is necessary to support ongoing business activities, as well as our expanding corporate footprint. ACTenviro vehicles covered more than 2.5 million miles in 2020, primarily operating in California, New Mexico, Arizona, Oregon, Washington, and Colorado.

**Fleet Safety**

ACTenviro’s drivers have a tremendous influence on our fleet safety program. We use telematics to monitor driving behavior (speed, braking, cornering, acceleration), we reward safe driving behavior, and we coach performance when needed.

In recent years, we have implemented the following improvements:

- Driver mentoring program
- Driver qualification training
- Acknowledgement of top drivers
- Tracking and evaluation of driver performance.
- Minimization of idle time of vehicles
- Better equipment
- Inspections every 90 days to ensure safety of vehicles while on the highway

**Other Impacts**

Other environmental impacts associated with ACTenviro business activities include energy usage (electricity and natural gas) to provide lighting and heat at our branches, water used for sanitation (there is no process water usage at our facilities) and the impact of miles commuted by ACTenviro employees. ACTenviro branches continually review energy usage and have implemented occupancy sensors for heating and cooling, as well as for lighting for indoor areas and outdoor dock areas.
ACTenviro’s corporate and local branches govern our excellent Compliance, Safety, Accountability (CSA) program. CSA evaluates transportation in specific criteria related to:

- Unsafe driving
- Hours of service driving
- Vehicle maintenance
- Hazmat compliance
- Controlled substance and alcohol
- Driver fitness

Our excellent CSA score allows ACTenviro to participate in government and private contracts that could exclude companies with negative CSA scores.

### Fuel Efficiency and Greenhouse Gas (GHG) Emissions

Miles driven and the associated fuel use is the primary environmental impact associated with ACTenviro business activities. ACTenviro fleet vehicles (tractor trailers transporting waste) traveled approximately 2.9 million miles in 2018 and 2019, and approximately 2.7 million miles in 2020. This reduction in miles driven is partly the result of overall business slow-down due to the impact of COVID-19, and due to more efficient vehicle routing. ACTenviro tractor trailers used more than 420,000 gallons of diesel fuel in 2018 and 2019, and almost 390,000 gallons in 2020, for an average fuel economy that ranged from 6.78 mpg in 2018, to 6.96 mpg in 2020.

<table>
<thead>
<tr>
<th></th>
<th>Distance (miles)</th>
<th>Total Fuel (gallons)</th>
<th>Fuel Economy (MPG)</th>
<th>GHG (tons CO2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>2,891,426</td>
<td>426,420</td>
<td>6.78</td>
<td>4,733.266</td>
</tr>
<tr>
<td>2019</td>
<td>2,902,142</td>
<td>422,825</td>
<td>6.86</td>
<td>4,693.354</td>
</tr>
<tr>
<td>2020</td>
<td>2,701,991</td>
<td>388,231</td>
<td>6.96</td>
<td>4,309.366</td>
</tr>
</tbody>
</table>

ACTenviro Fuel Economy 2018 – 2020 and GHG Impact (Tractor/Trailer)
Diesel has 2,778 grams of carbon per gallon and (according to EPA estimates) 99% of fuel is burned. Carbon in fuel is converted into CO2 by burning, and the conversion factor for weight of carbon to weight of CO2 is $44/12 = 3.67$.

- $2,778 \text{ grams carbon/gallon diesel} \times 0.99 \times 3.67 = 10,093 \text{ grams CO2 created per gallon of diesel burned}$
- This can be converted to pounds (and tons) of CO2: $10,093 \text{ grams/1,000} = 10.093 \text{ Kg x 2.2 lbs./Kg = 22.2 lbs. CO2}$ create per gallon of diesel burned

Based on this, ACTenviro waste transport activities generated more than 4,700 tons of CO2 in 2018.

There are two ways that fuel usage can be minimized:

1. Driving fewer miles (based on better scheduling of vehicles and improving efficiency of vehicle use)
2. Increasing fuel efficiency (through more fuel-efficient equipment, as well as better driver practices)

Due to improved driving, newer vehicles and increased equipment maintenance, ACTenviro’s over-the-road drivers improved fuel efficiency by 2.65% from 2018 to 2020. This improvement in fuel economy represents a savings of almost 103,000 gallons of fuel — or a reduction in potential emissions of more than 100 tons of CO2.
Putting the Environmental First

The waste management services we provide are a key resource to help our customers meet their own stringent sustainability goals, allowing them to take better care of their customers, their communities, and the planet.

- We are passionate about finding and delivering solutions to our clients to handle their waste in the safest, most environmentally friendly ways.
- We use innovation to minimize ecological impact. Through superior technology, reusable products, and recycling initiatives, our solutions minimize landfill, manufacturing excess, and CO2 emissions.
- ACTenviro takes pride in being a preferred partner for “zero waste to landfill” goals for many customers.
Scope of ACTenviro Business Activities

ACTenviro provides safe, compliant, and cost-effective waste management solutions for our clients including management of:

Hazardous Waste (state and federal)

- Hazardous Waste refers to wastes with chemical properties that may be harmful to the environment. Some wastes are regulated as Hazardous Waste based on federal (RCRA Hazardous) definitions and some wastes are regulated as hazardous waste based on state definitions (non-RCRA Hazardous Waste).

- Medical Waste (also called biomedical waste, biohazardous waste) refers to potentially infectious wastes, based on state regulations. Examples include hospital waste, bandages, blood and tissues, needles, and contaminated sharps as well as culture dishes and laboratory equipment contaminated with potentially infectious microorganisms. In some states chemotherapy wastes and some waste pharmaceuticals are also managed as medical waste.
Universal & Electronic Waste (e-waste)

- Universal waste includes fluorescent and other types of bulbs, batteries, mercury-containing equipment, and similar wastes. Electronic waste refers to printed circuit boards or equipment containing printed circuit boards. Universal wastes are a sub-set of regulated hazardous waste. These wastes contain metals or other hazardous universal waste regulations that require them to be recycled, or for metals to be recovered to prevent harm to the environment.

Non-regulated Waste

- Non-regulated wastes do not belong in any of the other categories but may require special handling or management, or may be suitable for recycling.

ACTenviro provides environmentally responsible disposal options for over 70 million pounds of client waste each year.

Hazardous waste (RCRA and non-RCRA) is the biggest category of waste we manage (54% in 2020), followed by non-regulated waste (40% in 2020). Medical waste and Universal/Electronic waste are a relatively small proportion of the waste managed by ACTenviro (by weight), however the management support of these regulated wastes streams is a key service for many of our clients.
How ACTenviro Handles Waste

Wastes are managed by ACTenviro for disposal, (landfill or incineration), or for recycling or recovery through one of several options, as discussed below. Not all management options are available for all types of waste — in some cases landfill may be the only option while for other wastes there may be a variety of disposal and recycling options.

- As noted above, regulations require universal waste (such as waste batteries, fluorescent bulbs and similar) to be recycled or for metals to be recovered.
- In general, recycling options have higher costs than disposal options, however recycling may help reduce long-term environmental liability and of course recycling helps generators meet their own sustainability goals.

In all cases, ACTenviro management of client wastes complies with all applicable regulatory requirements.

ACTenviro offers clients a variety of options for the disposal of their regulated wastes, either through our wide variety of vendors or through our internal processing.

- As a broker, we can work with TSD facilities and other vendors across the country to find the best solution in terms of cost, environmental liability and sustainability for our customers.
- We also operate our own RCRA hazardous waste facility in Albuquerque, New Mexico, allowing us to target specific waste streams and provide even more cost-effective recycling options to clients.

Hazardous Waste Recycling

Hazardous waste can be managed for disposal, via landfill or incineration for example, or through one of several recycling options such as fuel blending, energy recovery, direct re-use, or waste-to-energy. Recycling reduces generators environmental liability and also the environmental impact associated with disposal.

Recycling — Fuel Blending

Flammable hazardous wastes can be blended with other materials and be re-used as a fuel, a process referred to as fuel blending. 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 a variety of processes, such as manufacturing of cement. The process conserves natural resources by replacing coal, oil, and other fossil fuels-waste.

Since nearly 60% of the cost of manufacturing cement is in the fossil fuels needed to produce temperatures of 3,000 F, fuel blending provides an alternative that is cost-effective while also reducing GHG emissions.

Wastes that are recycled through fuel blending are assigned a recycling Management Method Code (MMC) of H061, allowing generators to track the disposition of their waste.
Solvent Recycling and Energy Recovery Process

Flammable and halogenated solvents can be recovered from waste for further use through solvent distillation. Spent solvents are first filtered and blended and then are purified through distillation. Sufficient heat is applied to boil the solvent and the solvent vapor rises through the distillation column, leaving contaminant behind as still bottoms. The purified solvent vapor is condensed back into liquid solvent to be sold to commercial and industrial users.

Not only is there the direct benefit from the recovery and re-use of recycled solvent as opposed to disposal, but the volume of waste generated is significantly reduced:

- For every 100 gallons of typical solvent waste that is distilled, 70 gallons can be recovered and re-used and 30 gallons of still bottom waste is generated.
- Although not suitable for solvent recovery, the still bottom waste can be blended with ash for further recycling via fuel blending.
- This represents a dramatic reduction in the amount of waste needing to be transported and therefore the number of truckloads needed to transport the waste off-site for secondary recycling at a cement kiln, which further reduces the carbon footprint and environmental impact of this waste.

Spent solvents and other flammable liquids that are recovered through distillation are assigned a recycling Management Method Code (MMC) of H020, allowing generators to track disposition of their waste.

Other Options - ACTenviro PPE Recovery Program

There are a variety of other recycling options, depending on the waste stream. As an example, ACTenviro has developed an innovative PPE recovery program that enables companies to recycle Personal Protective Equipment (accessories such as hoods, masks, shoe covers, safety eyewear, and other items).

By recycling rather than discarding PPE using ACTenviro PPE Recovery Program, companies can divert these hard-to-recycle solid waste streams from the landfill and get one step closer to achieving their zero waste goals.

Hazardous Waste Recycling at ACTenviro

ACTenviro specializes in recycling all types of wastes in order to maximize the use of natural resources and keep hazardous materials out of landfills. Our emphasis on recycling and re-use is a key resource for ACTenviro customers committed to waste minimization, good product stewardship and the Responsible Care®.

In 2020, ACTenviro worked with our customers to recycle or recover over 21 million pounds (over 30%) of the hazardous waste that we manage. Decisions regarding disposal options (and associated) costs are up to the customer, however ACTenviro is able to support this high level of hazardous waste recycling through our in-depth industry knowledge and our wide network of vendors, which allows us to provide customers a wide range of options.
### Hazardous Waste Recycling (lbs)

<table>
<thead>
<tr>
<th></th>
<th>2018 (lbs)</th>
<th>2019 (lbs)</th>
<th>2020 (lbs)</th>
<th>3-year Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACT Treatment – Recycled</td>
<td>5,706,520</td>
<td>6,606,519</td>
<td>4,545,670</td>
<td>16,858,710</td>
</tr>
<tr>
<td>ACT Treatment – Disposed</td>
<td>1,569,127</td>
<td>1,371,965</td>
<td>879,415</td>
<td>3,820,506</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>7,275,647</strong></td>
<td><strong>7,978,484</strong></td>
<td><strong>5,425,085</strong></td>
<td><strong>20,679,216</strong></td>
</tr>
<tr>
<td>Vendor – Recycled</td>
<td>12,680,738</td>
<td>13,512,554</td>
<td>16,534,367</td>
<td>42,727,658</td>
</tr>
<tr>
<td>Vendor – Disposed</td>
<td>50,136,735</td>
<td>43,432,079</td>
<td>45,448,222</td>
<td>139,017,035</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>62,817,472</strong></td>
<td><strong>56,944,632</strong></td>
<td><strong>61,982,588</strong></td>
<td><strong>181,744,693</strong></td>
</tr>
</tbody>
</table>

### Hazardous Waste Recycling (%)

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>3-year Avg</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACT Treatment % Recycled</td>
<td>78%</td>
<td>83%</td>
<td>84%</td>
<td>82%</td>
</tr>
<tr>
<td>Vendor % Recycled</td>
<td>20%</td>
<td>24%</td>
<td>27%</td>
<td>24%</td>
</tr>
<tr>
<td><strong>Overall % Recycled</strong></td>
<td>26%</td>
<td>31%</td>
<td>31%</td>
<td>29%</td>
</tr>
</tbody>
</table>

ACTenviro Hazardous Waste Recycling (lbs) 2018 - 2020

ACTenviro Hazardous Waste Recycling (%) 2018 - 2020
PaintCare and Latex Paint Recycling

ACTenviro began participating in the PaintCare program late in 2020. PaintCare is a non-profit stewardship organization created by the American Coatings Association in 2009 that designs and operates the paint recycling program on behalf of paint manufacturers.

PaintCare maintains a network of dedicated collection sites and paint retail locations to support recycling of waste architectural paint (latex and oil-based). Collected paint is reused or donated as-is, used to create recycled-content paint, or (if not suitable for those purposes) used in asphalt blends, as landscaping material or fuel for cement kilns.

ACTenviro 2020 PaintCare Totals

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

Universal wastes, including fluorescent lamps, batteries and similar wastes are a subset of regulated hazardous wastes and must be recycled or recovered to prevent landfill disposal and potential environmental damage. ACTenviro offers a sustainable solution for electronic waste to convert unwanted or unusable materials into marketable materials.

- Electronic waste, which is managed under our zero-export policy, is dismantled into component parts, and recycled into marketable materials.
- The electronics recycling program at ACTenviro serves to protect the environment and increase the rate of collection for recycling, while providing clients with convenient and secure service.
ACTenviro processes 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 landfills.

All universal waste is recycled, however, by processing at ACTenviro branches, we can segregate different types of waste allowing for increased efficiency, and reduced client costs. Overall, ACTenviro managed more than 2 million pounds of universal waste in 2020. This represents a decrease from previous years due to changing disposal options for this type of waste.
Regulated Medical Waste (Bio-Medical Waste)

A prime example of ACTenviro’s sustainability-minded approach to waste management is our Microwave Disinfection Units (MDUs), two machines installed in 2016 and 2017 and located in our Escondido (San Diego-area) branch. The MDUs are the first of their kind in California and offer a waste-to-energy option for the processing of regulated medical waste.

Processed wastes are thoroughly disinfected, rendered unrecognizable via shredding, and reduced in volume by approximately 80% (reducing hauling emissions and costs).

- When sent waste-to-energy, 1 ton of treated waste can power the average American home for over 2 weeks (per U.S. Department of Energy 2014 statistics).
- Since its inception, the MDUs have processed over two million pounds of medical waste.

All of the waste processed in the MDU is recycled after treatment, through a waste-to-energy process, as opposed to vendors that typically treated medical waste or landfill after autoclave or thermal treatment.

The amount of waste recycled in the MDU (and overall) decreased in 2020, compared to prior years due to business considerations, however, ACTenviro continues to offer this option to customers looking for a more sustainable option to manage their medical waste.
2020 Waste Totals by Weight (pounds) by State
What’s Next

This year presented challenges like none other. Grounded in our core values of safety, family, professionalism, customer commitment and forward thinking, our team weathered the storm.

Our EHS team was a step ahead ensuring our employees and clients were able to carry out their essential work duties in full compliance with local, state, and federal regulations and without undue risk to health or safety. The management team implemented flexible work policies and offered employee assistance to help our team cope with the stress and uncertainty of the COVID-19 pandemic.

We are committed to promoting economic prosperity, social responsibility, and environmental stewardship through every aspect of our business for all of our stakeholders.

— ACTenviro Corporate Sustainability Policy

While we did not experience the company growth planned for 2020, we are extremely optimistic about the journey ahead. Our core values and commitment to sustainability continue to guide us on the path of strategic and sustainable growth. This means:

- Helping clients achieve their sustainability goals with respect to waste management, safety, and regulatory compliance
- Enhancing the customer experience by investing in long-term partnerships
- Pursuing organic and strategic growth that aligns with our company values
- More robust sustainability reporting with intention of implementing the core option of GRI reporting standards
- Institutionalized data collection and cross functional evaluation across business departments
- Mid- and long-term goal setting

You are invited to join us on this journey, not as a bystander but rather, an active participant. Share with us the issues that matter most to you and the obstacles you face in achieving your business goals. When we tackle these issues together, the impact is greater.

Connect with us

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