

GRI Index

GRI 102: General Disclosures 2016*

DISCLOSURE	DESCRIPTION	CROSS-REFERENCE OR ANSWER
ORGANIZATIONAL PROFILE		
102-1	Name of the organization	Covanta Holding Corporation
102-2	Activities, brands, products and services	2020 10-K, pp. 5-6 Materials Management
102-3	Location of headquarters	445 South Street, Morristown, NJ 07960
102-4	Location of operations	2020 10-K, p. 5 United States, Canada, China, Ireland, Italy, and the United Kingdom.
102-5	Ownership and legal form	Covanta is wholly owned by Covanta Holding Corporation. Prior to November 30, 2021, Covanta Holding Corporation was listed and publicly traded on the New York Stock Exchange under the ticker symbol CVA. On November 30, 2021, Covanta Holding Corporation was acquired by the EQT Infrastructure V fund ("EQT Infrastructure").
102-6	Markets served	2020 10-K, pp. 5, 7-16 Materials Management
102-7	Scale of the organization	2020 10-K, pp. 5, 7-16, 21 Performance Tables / Operations Performance
102-8	Information on employees and other workers	Performance Tables / Workforce Performance Performance Tables / Diversity Performance The vast majority (more than 90%) of the organization's activities, as measured by full-time equivalents, are performed by Covanta employees. We consider contractors that perform periodic work at our facilities, particularly for maintenance, to be outside of our regular activities. There are no significant variations in employment numbers.
102-9	Supply chain	2020 10-K, pp. 7-11
102-10	Significant changes to the organization and its supply chain	2020 10-K, pp. 5-6, 10-11
102-11	Precautionary principle or approach	Community Connection / Our Approach
102-12	External initiatives	Covanta supports the UN Sustainable Development Goals.
102-13	Membership of associations	Covanta is a member of various industry groups including the Energy Recovery Council, Business Council for Sustainable Energy, Environmental Research and Education Foundation, Biomass Power Association, Confederation of European Waste-to-Energy Plants, Environmental Services Association, Product Stewardship Institute, and the Ontario Waste Management Association. Covanta plays a leadership role or actively contributes to these engagements, with our executives serving on the boards or as association members. We collaborate and interact with select organizations, including the Go Green Initiative to strengthen our policies, activities and performance. Through our Community Outreach and Environmental Justice Policy, we work to understand and resolve issues and concerns of our local community members.
STRATEGY		
102-14	Statement from senior decision-maker	A Message from our Senior Leadership, pp. 4
ETHICS AND INTEGRITY		
102-16	Values, principles, standards, and norms of behavior	Sustainability Blueprint
102-17	Mechanisms for advice and concerns about ethics	If any employee has questions about the application of the Policy of Business Conduct or concerns about potential instances of non-compliance, they are encouraged to bring their concerns forward to the attention of their supervisor or members of senior management. Employees can also: Call Covanta's third-party hotline, THE NETWORK, at 1-800-241-5689 or internationally, at +1 770-409-5006 or contact the Audit Committee of the Board of Directors. Information reported to The Network or Covanta's Audit Committee will be handled on a confidential and anonymous basis, if desired, and referred to Covanta's management for appropriate response. Covanta prohibits retaliation against an employee who has filed, in good faith, a complaint or expressed a concern under this policy or under any law, or for assisting in a complaint investigation.
GOVERNANCE		
102-18	Governance structure	Governance Documents
STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups	Sustainability Blueprint / Listening to and Learning from Our Stakeholders
102-41	Collective bargaining agreements	Performance Tables / Workforce Performance As of December 31, 2020, approximately 9% of our employees are covered by collective bargaining agreements with various expiration dates through 2021.
102-42	Identifying and selecting stakeholders	Sustainability Blueprint / Listening to and Learning from Our Stakeholders
102-43	Approach to stakeholder engagement	Sustainability Blueprint / Listening to and Learning from Our Stakeholders
102-44	Key topics and concerns raised	Sustainability Blueprint / Listening to and Learning from Our Stakeholders
REPORTING PRACTICE		
102-45	Entities included in the consolidated financial statements	2020 10-K, pp. 5
102-46	Defining report content and topic boundaries	Sustainability Blueprint / Materiality Analysis
102-47	List of material topics	Sustainability Blueprint / Materiality Analysis
102-48	Restatements of information	We updated multiple sets of historic data in the Report Performance Tables due to methodology changes and data corrections, outlined below: Air Emissions: Annual average emissions concentrations were updated historically where data corrections impacted overall average. Greenhouse Gases: Scope 1 GHG emissions have been recalculated with the AR5 20-yr methane Global Warming Potential of 86 (previously used the AR4 100-yr GWP of 25). Scope 3 emissions boundary has been expanded to include sources such as upstream and downstream transportation. Waste Processed: Waste recycled is restated to include corrections to metal

		recovery and historic bottom ash reuse in Dublin that was previously not captured. Reported landfilled tons now include landfilled wastes from transfer stations, and reported landfilled WTE residues now include wastes from processing at our RDF/shred-and-burn facilities as well as residue ash landfilled at our Fairless Hills metal processing facility. Reported Sustainable Waste Management and Waste Recycled tons are calculated in accordance with our Sustainability-Linked Financing reporting boundaries, described in response 102-49.
102-49	Changes in reporting	We updated our reporting approach to the following sections in the Performance Tables: Waste Processed, Energy Generation, Energy Use, and the Operational control basis of the GHG life-cycle benefit. Previously, these fields included 100% of facility operations regardless of operational status or equity interest. All data were recalculated on an operational control + equity interest basis, excluding China, unless otherwise noted. This is in line with the boundaries for our Sustainability-Linked Financing.
102-50	Reporting period	January 1, 2020, through December 31, 2020
102-51	Date of most recent report	About This Report, pp. 3
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Contact
102-54	Claims of reporting in accordance with the GRI Standards	About This Report, pp. 3
102-55	GRI content index	About This Report, pp. 3
102-56	External assurance	We do not currently assure our sustainability report in whole; however, several components of the report are subject to third-party verification and/or regulatory reporting requirements that carry the weight of law and the potential for civil and criminal penalties. Specifically, our reporting of waste sustainably managed and recycled, is subject to verification as part of our sustainability-linked financing, beginning with 2020. All of our GHG emissions from our WTE facilities are reported as part of the U.S. EPA's Mandatory GHG Reporting Program, or similar such program in other jurisdictions. Furthermore, environmental performance metrics are calculated based on data reported to environmental regulatory agencies. We may consider seeking additional external assurance for specific indicators in the future.
ELECTRIC UTILITY SECTOR SUPPLEMENT		
G4-EU1	Installed capacity, broken down by primary energy source and by regulatory regime	2020 10-K, pp. 9-10
G4-EU2	Net energy output broken down by primary energy source and by regulatory regime	Performance Tables / Operations Performance
G4-EU5	Allocation of CO ₂ e emissions allowances or equivalent, broken down by carbon trading framework	Environmental Sustainability / Addressing Climate Change

* Covanta's 2021 Sustainability Report applies the 2016 version of the GRI Standard's; "2016" refers to the standard's issue date, not the date of information presented in this report.

GRI 103: Topics and Topic Boundaries 2016*

MATERIAL TOPIC	MANAGEMENT APPROACH CROSS-REFERENCE	RELEVANT EXTERNAL ENTITIES
ECONOMIC		
GRI 201: Economic Performance 2016	2020 10-K, pp. 7	Communities Customers Investors Regulators
GRI 202: Market Presence 2016	Community Connection	Communities Customers
GRI 203: Indirect Economic Impacts 2016	Community Connection	Communities
GRI 204: Procurement Practices 2016	Sustainability Blueprint	Communities Customers Investors Regulators
ENVIRONMENTAL		
GRI 301: Materials 2016	2020 10-K, pp. 11-12	Communities Customers Investors
GRI 305: Emissions 2016	2020 10-K, pp. 16-20 Environmental Sustainability / Addressing Climate Change Environmental Sustainability / Air Emissions	Communities Regulators
SOCIAL		
GRI 413: Local Communities 2016	Community Connection	Communities Regulators
GRI 416: Customer Health and Safety 2016	Community Connection	Communities Customers Regulators

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GRI 200-400 Topic-Specific Disclosures 2016*

GRI TOPIC	DISCLOSURE	DISCLOSURE DESCRIPTION	DISCLOSURE CROSS-REFERENCE, EXPLANATION OR OMISSION
ECONOMIC			
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	2020 10-K, pp. 7 We report North America and totals, but not by specific country (e.g., Italy, Ireland, and the United Kingdom). Performance Tables / Economic Performance Community Connection
	201-2	Financial implications and other risks and opportunities due to climate change	2020 10-K, pp. 7 Environmental Sustainability / Addressing Climate Change Waste as a Resource, pp. 12 Covanta's Risk Management team provides an annual update on enterprise risk to our board. The last update in September 2020 includes a heat map of key risks facing the organization. The resulting "heat map" is based on senior management's thoughts regarding each risk. The senior management team evaluates each risk in terms of probability (likelihood), impact (severity) and velocity (timing). "Global Warming" was specifically enumerated on the list of evaluated risks in 2018; however, the effects of climate change were embedded in

risk categories evaluated in 2020, including "Weather," a subcategory of "Operational Risk" – the risk safe, uninterrupted operation of business is compromised due to unforeseen circumstances, including but not limited to mechanical breakdown, weather, fire, cyber breaches, etc. ..." Climate change is also identified within "Law & Policy risk," where changes to local and national policies designed to mitigate climate change could impact our operations.

GRI 202: Market Presence 2016	202-2	Proportion of senior management hired from the local community	Covanta strives to hire senior management from the local community. Many of our facility managers have come up through the ranks at the facility, helping to ensure long-term ties to the community. When evaluating our workforce, approximately 67% of our workers live within 15 miles of their job, with 22% living less than 5 miles from their work location. About 43% of our workers live in the same county as their work location, with the average worker living within 19 miles of their work site.
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	Community Connection Partnering With Our Communities, pp. 34
	203-2	Significant indirect economic impacts	Community Connection
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	A portion of Covanta's nationwide supply chain budget is also assigned to local suppliers. More information can be found in our Supply Chain Management policy . Covanta Partners and Suppliers
GRI 205: Anti-corruption 2016**	205-2	Communication and training about anti-corruption policies and procedures	100% of Covanta employees (management and non-management) are expected to read and comply with our Policy of Business Conduct. The policy covers topics such as financial reporting, corruption, copyrights, and environmental safety and health.
ENVIRONMENTAL			
GRI 301: Materials 2016	301-1	Materials used by weight or volume	2020 10-K, pp. 9-10 Performance Tables / Operations Performance
GRI 302: Energy 2016**	302-1	Energy consumption within the organization	Performance Tables / Operations Performance
GRI 303: Water and Effluents 2018**	303-3	Water withdrawal	Performance Tables / Operations Performance Environmental Sustainability / Optimizing Water Use
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	Performance Tables / Environmental Performance
	305-2	Energy indirect (Scope 2) GHG emissions	Performance Tables / Environmental Performance
	305-3	Other indirect (Scope 3)	Performance Tables / Environmental Performance Environmental Sustainability / Addressing Climate Change
	305-4	GHG emissions intensity	Performance Tables / Environmental Data
	305-5	Reduction of GHG emissions	Performance Tables / Environmental Performance Environmental Sustainability / Addressing Climate Change
	305-7	NOx, SOx and other significant air emissions	Performance Tables / Environmental Performance Environmental Sustainability / Air Emissions
GRI 306: Effluents and Waste 2016**	306-2	Waste by type and disposal method	Performance Tables / Operations Performance
GRI 307: Environmental Compliance 2016**	307-1	Non-compliance with environmental laws and regulations	Environmental Sustainability Performance Tables / Environmental Performance
GRI 308: Supplier Environmental Assessment 2016**	308-1	New suppliers screened using environmental criteria	Nearly 100% of new suppliers were screened using environmental criteria in 2020.
SOCIAL			
GRI 401: Employment 2016**	401-1	New employee hires and employee turnover	Performance Tables / Workforce Performance
	401-2	Full-time benefits not provided to temporary / part-time employees	Workforce Engagement / Building a Great Place to Work Benefits
GRI 403: Occupational Health and Safety 2018**	403-1	Occupational health and safety management system	Safety and Health
	403-2	Hazard identification, risk assessment, and incident investigation	Safety and Health
	403-3	Occupational health services	Safety and Health
	403-4	Worker participation, consultation and communication on occupational health and safety	Safety and Health At our operating facilities, formal joint management-worker health and safety committees are run by our hourly employees. In all cases, these teams provide feedback to, and collaborate with, facility and regional safety leads, as well as the Covanta safety management team.
	403-5	Worker training on occupational health and safety	Safety and Health
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Safety and Health
	403-9	Work-related injuries	Safety and Health / Delivering on Safety Performance Performance Tables / Safety and Health Performance
GRI 404: Training and Education 2016**	404-1	Average hours of training per year per employee	Workforce Engagement / Investing in Training and Development
	404-2	Programs for upgrading employee skills and transition assistance programs	Workforce Engagement / Investing in Training and Development
	404-3	Percentage of employees receiving regular performance and career development reviews	Workforce Engagement / Investing in Training and Development
GRI 405: Diversity and Equal Opportunity 2016**	405-1	Diversity of governance bodies and employees	Workforce Engagement / Diversity and Inclusion Commitment Performance Tables / Diversity Performance Building A Great Place to Work, pp. 24
GRI 407: Freedom of Association and Collective Bargaining 2016**	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining might be at risk	Covanta does not have operations in which employees' rights to exercise freedom of association or collective bargaining are at risk.
GRI 411: Rights of Indigenous Peoples 2016**	411-1	Incidents of violations involving rights of indigenous peoples	None. The vast majority of Covanta's facilities are not cited among indigenous regions. There are no known incidents of violations involving rights of indigenous peoples and actions taken.
GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	Community Connection Partnering with Our Communities, pp. 34
GRI 414: Supplier Social Assessment 2016**	414-1	New suppliers that were screened using social criteria	Nearly 100% of new suppliers were screened using social criteria in 2020.



GRI 415: Public Policy 2016**	415-1	Political contributions	Covanta Political Contribution Policy and Disclosure Covanta reports all political contributions as required by law. In addition, prior to November 30, 2021, Covanta reported its annual political contributions to the Nominating & Governance Committee, or predecessor committees, of its board of directors and provided a summary report of its political contribution on its corporate investor relations website.
GRI 416: Customer Health and Safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	Our primary services are sustainable waste management and electrical generation at our energy-from-waste (WTE) plants. The emissions of WTE facilities are closely regulated through federal and state permit requirements and limits. All WTE facilities operate well below these limits, and we continue to improve our performance, as indicated in our section on environment performance within this report. Health impacts associated with emissions from WTE facilities have been studied extensively. For example, one major study from the U.K. Health Protection Agency concluded that the negative health impacts associated with well-regulated WTE facilities are likely to be very small, if even detectable. More information on these studies is provided in Environmental Sustainability / Air Emissions .
GRI 418: Customer Privacy 2016**	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	None. There have been no complaints regarding breaches of customer privacy and losses of customer data.
GRI 419: Socioeconomic Compliance 2016**	419-1	Noncompliance with laws and regulations in the social and economic area	The total amount of safety-related fines and penalties at our North American facilities was \$3,250 in CY 2019. No other fines, penalties or nonmonetary sanctions were received for the social and economic area in the period from 2019-2020.

* With the exception of GRI 303 and 403 that apply the 2018 version of the GRI Standards, Covanta's 2021 Sustainability Report applies the 2016 version of the GRI Standards; "2016" refers to the standard's issue date, not the date of information presented in this report.

**We have reported additional disclosures not related to material topics.

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