OCTOBER 2026

STRONGER WASTE VETTING, STRONGER BUSINESS

How a Robust Waste Vendor Audit Protocol Protects Companies — The ABB Framework as a Case Study

ENGINEERED TO OUTRUN

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ABB IN THE U.S. AT A GLANCE

ABB is a global technology leader in electrification and automation, enabling a more sustainable and resource -efficient future.

By connecting our engineering and digitalization expertise, we help industries run at high performance, while becoming more efficient, productive, and sustainable so they outperform.

We call this: **'Engineered to Outrun.'**

The United States is ABB's largest market, where we have significantly expanded our operations through strategic acquisitions and investments. Employing thousands across the nation, ABB's U.S. footprint is marked by 100 years of technological breakthroughs and industry firsts.

ABB.COM/US

A CENTURY OF MILESTONES



Investment & Growth

Country headquarters Cary, North Carolina

About ~ 17,000 people in the U.S.

$96+ billion in U.S. market opportunities

U.S. is approximately 29% of ABB revenue

Entered U.S. in 1925 when BBC formed ABBEC (American Brown Boveri Electric Corp.)

$14 billion invested 15 acquisitions & CAPEX since 2010

Nearly 40 manufacturing, distribution, and operational facilities, including 10 major R&D centers

75-80% of products are made in the US.

~14,000 U.S. customers in all 50 States

100% renewable electricity used in all manufacturing operations

9,000+ distributor locations

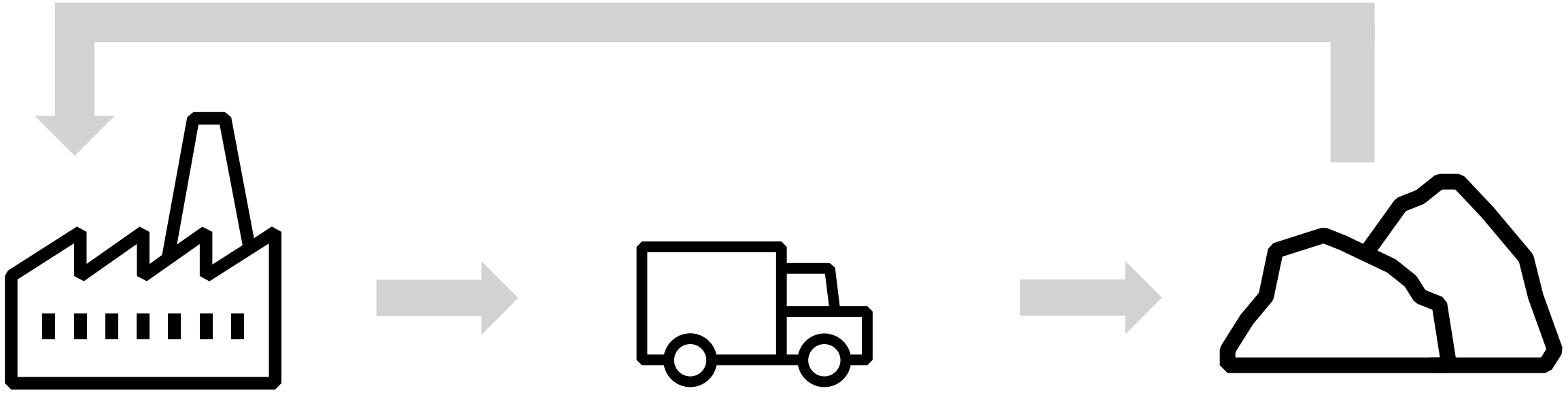
More than $32 million in charitable contributions to U.S. communities since 2016

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THE PROBLEM

Why waste vetting can't be left to chance

Environmental Liability
Cradle to Grave



“Cradle”

Your Facility Generating Waste

“Grave”

Landfill / Disposal Facility

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The Hidden Costs of Unvetted Waste Vendors

Environmental, financial, and reputational risks compound quickly



Environmental Liability

Contamination, Superfund designations, and long-term remediation costs fall on waste generators



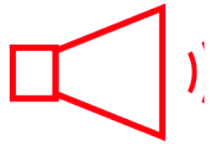
Regulatory Exposure

Permit violations, NOVs, and enforcement actions at a vendor site can directly implicate the business



Financial Loss

Vendor bankruptcy disrupts waste streams and can leave generators liable for cleanup



Reputational Damage

Community incidents, fatalities, or media coverage at a waste site reflect on every customer



Operational Disruption

Reliance on a non-compliant vendor creates supply chain and continuity risk

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IMPLEMENTATION ROADMAP

How to build a waste vetting program in your organization

Four Foundational Steps

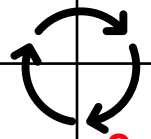
Launching a waste vetting program

1. Map your waste landscape

- Compile a full inventory of all hazardous & non - hazardous waste disposal facilities currently in use
- Identify your facility generator classification (LQG vs. SQG). Prioritize by waste volume and risk

2. Establish governance

- Form a waste management steering committee with HSE, legal, and operations representation
- Define roles, escalation paths, and approval authorities



4. Train your HSE community

- Equip decision makers to interpret CHWMEG reports
- Conduct facility interviews, and apply scoring consistently

3. Adopt a standardized audit tool

- Implement a standardized process to evaluate disposal site criteria
- Establish scoring system that determines disposal site acceptance or avoidance

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Establish a Hierarchy of Facilities to Audit

ALL NEW Hazardous Waste Disposal Sites

- Any new site contemplated for use should be audited BEFORE sending waste
- “Management of Change”

In-Use Hazardous Waste Disposal Sites

- Prioritize LQG Sites
- Then move to SQG Sites
- VSQG Sites

Non-Hazardous Wastes

- Oils
- Special Wastes
- Recycled Waste
- Universal Waste

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Data Tools That Power the Framework

Verified, multi -source intelligence replaces guesswork

EPA Envirofacts:

Multi -Media Info Searches

OSHA Establishment Search:

H&S-Related Inspections and Violations

EPA ECHO:

Compliance and Enforcement Data

Vendor/CHWMEG Supplied Info:

Vendor audit packages, COI

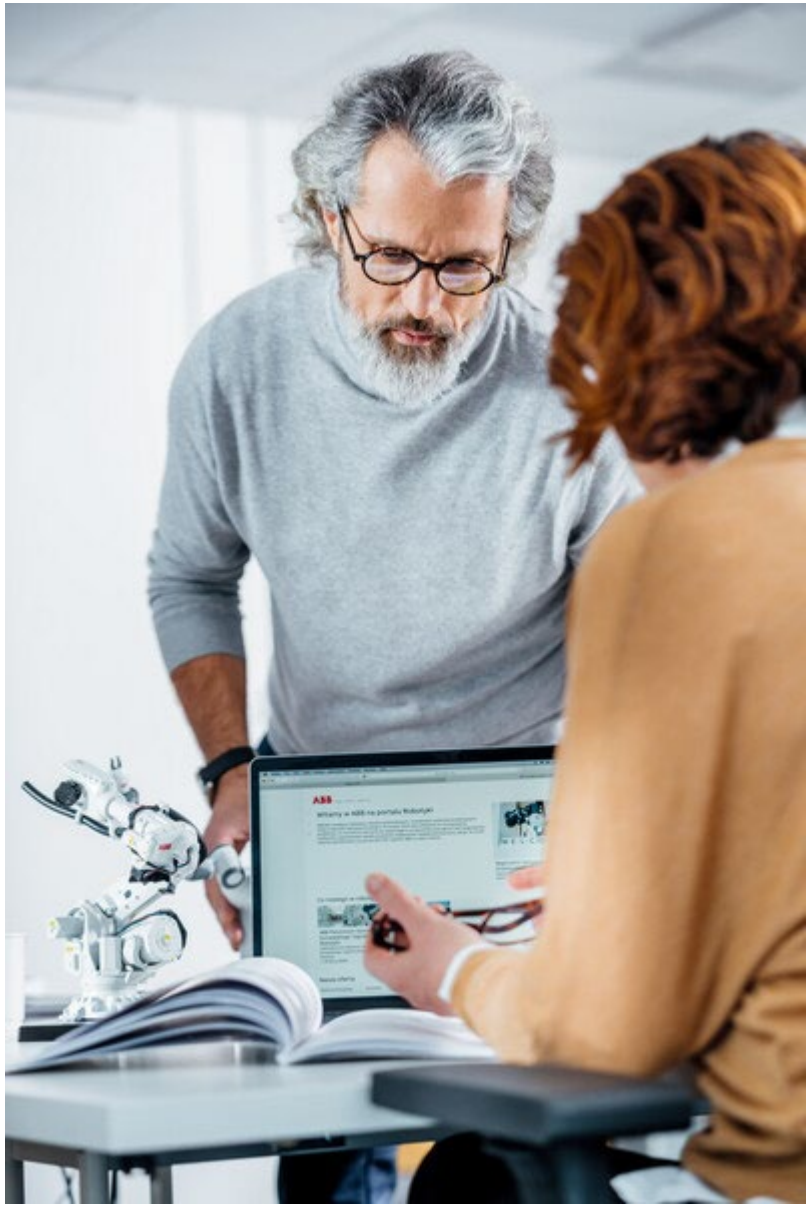
Standardized CHWMEG Reports; unbiased, cost-effective resource

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Sustaining and Improving the Program

A living protocol evolves with your risk landscape

- Re-audit facilities periodically
- Maintain a centralized record of all audits, scores, and approvals
- Share audit findings across facilities
  - — Best practices identified at one site benefit all
- Conduct quarterly Steering Committee reviews to identify trends and update protocol criteria
- Use real audit outcomes — violations, near -misses, vendor failures — to refine scoring thresholds



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THE ABB FRAMEWORK

A structured, risk -based approach to waste vendor auditing

ABB's Audit Protocol

Key Elements

1. Identify your Hazardous Waste Disposal Facilities
2. Complete Desktop Review for all NEW disposal facilities and existing facilities (every 3-5 yrs.)
   - Request "Audit Package" from disposal vendor
   - Collect publicly available information
   - Order CHWMEG Report
   - Schedule an interview with waste disposal representative
3. Populate ABB Waste Disposal Protocol and Review Score
4. Submit Results to ABB Steering Committee for final review and approval (to be reviewed quarterly)

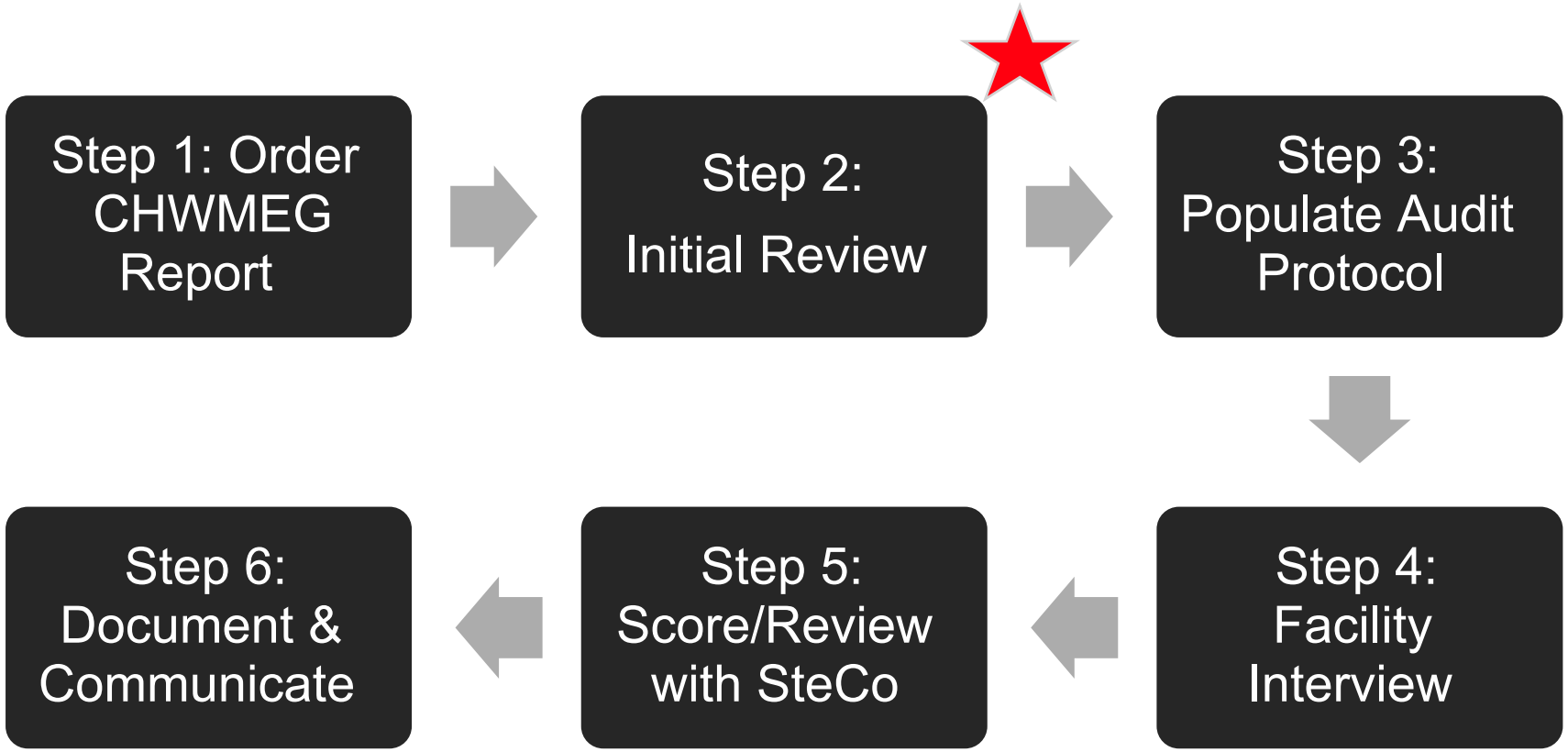


Repository of reviewed waste disposal facilities hosted on internal SharePoint Site

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The Audit Process — Step by Step

A disciplined workflow from initial review to final approval



★ Review Critical “Red Flag” Criteria as part of Step 2

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Scoring System — Clear, Objective Decisions

Evaluation criteria with built -in scoring removes subjectivity

Evaluation Criteria	Weighted Score	Max Possible Score
Section 1 - Facility Information	0%	5%
Section 2 - Waste Management	0%	20%
Section 3 - Permits & Programs	0%	15%
Section 4 - Environmental Setting & Impact	0%	25%
Section 5 - Financial Strength	0%	25%
Section 6 - Safety & Community Relations	0%	10%
Total Score	0%	100%

Score*
>70-100
>50-70
0-50

All Scores to be Reviewed by SteCo for Final Review and Decision

- Facility Information
- Waste management
- Permits &Programs
- Environmental Setting & Impact
- Financial Strength
- Safety &Community Relations

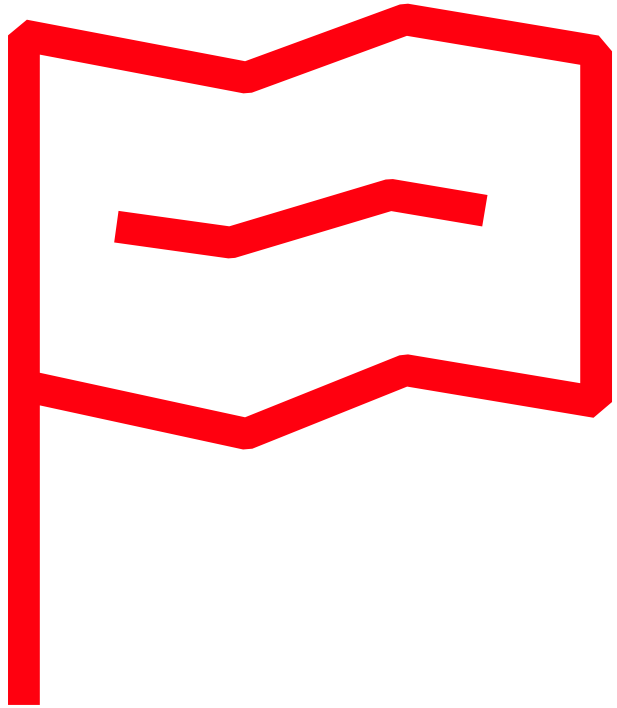
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Critical Questions to Assess During Preliminary Review

Risk-based Prioritization Disqualifies Use Early

Red Flag Criteria

- ❑ Disposal site has an unlined landfill
- ❑ Site expired permits or active NOVs
- ❑ Site listed as a CERCLIS (Superfund) site
- ❑ Vendor or parent company bankruptcy
- ❑ Insurance below minimum thresholds
- ❑ Fatalities or serious injuries at the facility
- ❑ Sensitive receptors within 0.1 mile
- ❑ Generating facility contributes >10% of total volume to the disposal site



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ABB Protocol – Excerpt from Financial Strength Criteria

		Total Possible Score	10
Section 5 Score:	**90%**	Total Score	9

SECTION 5 - FINANCIAL STRENGTH AND INSURANCE		Auditor Guidance
Note: *The term "Company" refers to the entity operating the waste facility. The Company could own and operate many facilities. The term "Facility Owner" refers to the entity which owns the waste facility.*		
Financial		CHWMEG Section I
How many years has the Company has been in business?	35	
Has the Company been in bankruptcy in the last five years?	Yes	CHWMEG Section I12a If Yes, ABB may not use this facility.
Who is the legal owner of the facility?	ABC Company	CHWMEG Section A14
How many times has the facility ownership changed in the last five years?	0	CHWMEG Section A27
Is the Company operating this waste facility privately held or publicly traded?	Public	
Has the current annual report or financial report (containing balance sheets, income statements, and cash flow schedules) for the Company been provided and reviewed by the Auditor?	No	CHWMEG Section I2
Is financial assurance maintained for the facility?	Yes	CHWMEG Section I7 If No, ABB may not use this facility.
If yes, what amount?	142 million	CHWMEG Section I9a3

Red font indicates a "Red Flag" criterion; If selected answer turns the cell pink, then ABB may not use this facility.

Green cells have drop -down boxes; these answers drive the scoring.

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Building an Effective Protocol

Key Features

- Provides a quantitative score for each site
- Prescribed questions and dropdown answers promotes consistency between sites and auditors
- Queues reviewer for where to find relevant information
- “Red Flags” are easily identified in the different topic areas

Benefits

- A single repository for all information about a waste vendor site
- Separate tab for each set of weighted criteria
- Highlights Red Flag criteria
- Specific prompts for the auditor to use if conducting an interview with the site
- Dropdown answers to facilitate completion



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CHWMEG – Standardized Vetting Reports

CHWMEG is a non-profit trade association comprised of manufacturing, and similar industrial organizations, educational/research institutions, and individual government installations.

CHWMEG's Facility Review Program reports allow members to obtain critical environmental, operational, and financial information relating to facilities that treat, dispose, recycle and/or store manufactured wastes and spent materials generated by members.

Benefits

- CHWMEG Contractors conduct an unbiased review
- Standardized report content
- Utilizes current data
- Relatively low cost

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Training

Bringing the tools to the HSE Community

- Develop a Standard Operating Procedure
- Train to the Protocol
    - Review key focus areas of the audit
    - Understanding Red Flag criteria
    - Interpreting the CHWMEG report
    - Conducting an effective interview
- Develop a Quick Reference Guide for populating the protocol
- Work with waste brokers to identify disposal facilities and communicate preferences
- Integrate into broader Management of Change process



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BENEFITS

Why a strong vetting protocol pays dividends across the business

Regulatory and Environmental Protection

Reduces legal exposure and environmental harm

- Ensures vendors hold valid permits (air, water discharge, RCRA Part B, hazardous waste operating)
- Screens out facilities with major violations
- Minimize potential impacts to the community
- Avoids Superfund co -liability — CERCLIS-listed sites are screened out before any waste is sent
- Fulfills "cradle to grave" obligations under RCRA



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Financial Risk Reduction

Structured vetting protects against costly surprises

Screens vendors for bankruptcy history

Confirms financial assurance mechanisms are in place to fund closure and remediation

Verifies adequate insurance coverage

Avoids downstream costs of remediation for impacts caused by non-compliant disposal sites

Conducting audit is low cost vs. millions in potential cleanup liability

Audit findings drive continuous improvement

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Operational Resilience and Reputational Strength

A competitive and ethical advantage

- Ensures business continuity — only compliant, financially stable vendors are approved for use
- Prevents reputational damage from association with facilities with NOVs and poor safety
- Demonstrates ESG commitment
- Establishes a culture of environmental stewardship throughout the supply chain
- Empowers HSE teams with consistent, data -driven audit tool





Source: ABB Waste Vendor Audit Protocol Training / Quick Reference Guide

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Key Takeaways

The case for strong waste vetting is clear



The greatest risk is doing nothing
— an unvetted vendor is an unknown, and unknowns may become liabilities

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Thank You!

Please Feel Free to Reach Out with Further Questions:

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