

Waste Management Policy

Policy Owner: Head of Operations	
Effective Date: 06/10/2026	Date of Last Revision: 06/10/2026

1. Purpose

This Policy applies to all Stephen Gould facilities, operations, and supply chain partners. Stephen Gould is committed to reducing waste across our operations and supply chain as part of our broader ESG strategy. This Policy outlines our internal practices, governance approach, and the expectations we hold for suppliers and partners in support of responsible waste management and environmental stewardship.

2. Scope

This policy applies to all Stephen Gould facilities, including distribution and fulfillment centers, and covers waste generated through packaging, materials handling, and general facility operations. It applies to all employees, contractors, and suppliers engaged in activities that generate or manage waste on behalf of Stephen Gould.

3. Governance and Responsibility

Accountability for this policy is shared across the organization, with clearly defined ownership at each level:

- **Executive Oversight:** Stephen Gould's Chief Strategy Officer oversees the sustainability committee, consisting of stakeholders from various departments responsible for sustainability initiatives. The Chief Strategy Officer communicates to the executive team and board members on Stephen Gould's sustainability strategy.
- **Sustainability Committee:** Collection of corporate stakeholders from Finance, Legal, Sales, and Operations, who are individually responsible for various sustainability efforts in their roles. The team is responsible for establishing Stephen Gould's sustainability strategy and execution.

4. Guiding Principles: Waste Hierarchy

Stephen Gould's approach to waste management follows the established waste hierarchy, prioritizing actions in the following order:

- **Reduce:** Minimize the volume and impact of materials used, particularly in packaging design and fulfillment processes.
- **Reuse:** Identify opportunities to reuse materials, packaging, and fulfillment supplies where feasible.
- **Recycle:** Maximize recycling of corrugated, paper, and packaging materials generated at our facilities.

- **Recover:** Where recycling is not feasible, pursue energy recovery or other reclamation options in accordance with local regulations.
- **Dispose:** Responsible disposal is treated as a last resort, managed through vetted and compliant vendors and haulers.

5. Internal Commitments

Stephen Gould will:

- Maximize recycling of corrugated, paper, and packaging materials generated at our distribution and fulfillment facilities.
- Track and report waste and recycling percentages at all Stephen Gould warehouses starting in 2027.
- Train facility staff on proper waste segregation and recycling procedures.
- Continuously assess vendors and haulers to ensure responsible disposal and recycling practices.

6. Supplier Expectations

Stephen Gould expects suppliers and packaging partners to:

- Comply with all applicable environmental and waste regulations in the jurisdictions where they operate.
- Support Extended Producer Responsibility (EPR) requirements, including timely reporting of material composition and packaging weights when requested.
- Design and supply materials that are recyclable, reusable, or made with recycled content wherever feasible.
- Minimize excess packaging and material waste in the products and materials supplied to Stephen Gould.
- Provide documentation of recyclability claims, material certifications, or sustainability data upon request.
- Promptly notify Stephen Gould of any material changes that could affect the recyclability or environmental footprint of supplied products, and in any event prior to shipment of affected products.

These expectations are further detailed in Stephen Gould's Supplier Responsibility Guide, which outlines broader environmental, labor, and ethical standards required of our supply chain partners.

Any material composition data, packaging weights, sustainability documentation, or other operational data that suppliers disclose to Stephen Gould under this policy will be handled in accordance with the confidentiality provisions of the supplier's existing agreement(s) with Stephen Gould. Nothing in this policy is intended to modify, supersede, or create obligations beyond those set forth in the applicable supplier agreement(s) with Stephen Gould.

7. Non-Compliance and Corrective Action

Suppliers who do not meet the expectations outlined in this policy may be subject to corrective action planning, increased monitoring, or reassessment of their status as a Stephen Gould supplier. Stephen Gould reserves the right to request documentation or conduct reviews to verify compliance. Repeated or unresolved non-compliance may affect a supplier's eligibility for continued or future business with Stephen Gould.

Stephen Gould encourages employees, suppliers, and partners to report suspected non-compliance or policy violations in good faith. Reports may be directed to Stephen Gould's anonymous workplace concern Hotline at 833- 527-2434, available 24 hours a day, 7 days a week. Stephen Gould prohibits retaliation against any individual who makes a good-faith report under this policy.

8. Communication and Availability

This policy is communicated to employees through internal channels and made available to suppliers and partners through Stephen Gould's supplier onboarding materials and, where applicable, our public-facing sustainability resources.

9. Related Policies and Documents

- Supplier Responsibility Guide
- Employee Handbook
- Annual CSR / Sustainability Report

10. Accountability

This policy applies to all Stephen Gould facilities and is reviewed annually by the sustainability committee. Stephen Gould reserves the right to amend, update, or withdraw this policy at any time in its sole discretion. Compliance is a shared responsibility across operations, procurement, and quality teams, with oversight from leadership on progress toward stated goals.

11. Policy Review

This policy will be reviewed on an annual basis, or sooner if required by changes in regulatory requirements, business operations, or supply chain composition. Revisions will be documented and communicated to relevant internal stakeholders and, where appropriate, to suppliers.