

Responsible Handling of Hazardous Materials



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The Home Depot has developed comprehensive policies and procedures around the handling and disposal of hazardous materials in our stores and supply chain facilities. These policies and procedures are incorporated into the written standard operating procedures ("SOPs") that govern how our associates do their jobs on a day-to-day basis. Our SOPs include specific standards on merchandising of products to meet fire code regulations, address product incompatibilities, ensure overall safety within our stores and protect the environment.

Our SOPs and related policies and procedures applicable to the handling and disposal of hazardous materials include:

- A Handling Hazardous Materials and Waste Program, which identifies hazardous materials sold or used by the Company, includes specific preventative steps to avoid spills and contamination, outlines procedures for handling damaged containers and provides robust countermeasures for clean up to limit the impact of spills.
- Training for all associates on recognizing hazardous materials in the workplace and more in-depth training on environmental compliance for specifically designated associates who are responsible for the storage and cleanup of hazardous materials.
- Requirements tailored to specific departments, including:
 - Garden Center: instructions on proper handling of bags of fertilizer and pesticides and guidance on how to check for and properly repair damaged bags;
 - Tool Rental: requirements for proper labeling, handling and storage of materials such as used oil and fuel; Paint: requirements for handling clean up of paint and paint-related debris (such as paint sticks, rags, etc.) and proper disposal of paint containers;
 - Plumbing: for stores that offer pipe cleaning, requirements for handling oily rags generated from cleaning; and
 - Receiving and Central Storage: requirements for accumulating hazardous waste and proper handling, labeling and storage of materials, including procedures ensuring separation of potentially incompatible materials and inventory of waste generated.
- Detailed checklists completed several times a week by associates working in departments where hazardous materials are handled to ensure compliance with procedures.
- Daily walks and routine inspections of key areas, including the outside garden areas, parking lots and front apron of the stores, to identify potential issues, and regularly



scheduled sweeps of fertilizer aisles and parking lots to protect against hazardous materials contaminating stormwater runoff or entering the environment through other means.

- Implementation of a bag patching program, in partnership with the U.S. Environmental Protection Agency, for bagged products such as fertilizers containing pesticides to minimize spills and reduce the amount of waste produced.
- Specific containers and spill kits located throughout the stores for the prompt and effective clean up and disposal of hazardous materials such as paint, solvents, aerosols, oil, fuel, pesticides and fertilizer.
- An online Handling Hazardous Materials and Waste Automation system, accessible through the handheld devices used by our associates and the associate intranet site, to provide guidance on the clean up, classification, labeling and storage of hazardous waste.
- Access to a third party consultant that provides an emergency response team available on a 24/7 basis to assist with clean up if a spill occurs and, if necessary, provide remediation services.