

Modern slavery – including but not limited to forced labour and child labour – and human trafficking are contrary to our Values and Principles¹. We do not tolerate slavery or human trafficking in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect EverGen employees, contractors, agents and members of the boards of directors of EverGen and all its subsidiaries to act with integrity and comply at all times with the laws, regulations and rules that apply to EverGen in the jurisdictions where we operate. If instances arise where these expectations are not met, we will review and respond.

ABOUT THIS STATEMENT
This Statement constitutes EverGen Infrastructure Corp’s Statement Regarding Modern Slavery (Statement), covering our fiscal year of January 1, 2023, to December 31, 2023. This Statement is made on behalf of EverGen Infrastructure Corp. and certain of its subsidiaries (collectively “EverGen”, “we”, “us” or “our”) pursuant to section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Canadian Act).

STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

EverGen, headquartered in Vancouver, British Columbia, is a sustainable infrastructure platform established to acquire, develop, build, own, operate, and consolidate a portfolio of Renewable Natural Gas (“RNG”), waste to energy, and related infrastructure projects in Canada and North America. EverGen was incorporated under the British Columbia Business Corporations Act on May 13, 2020, and trades on the TSX Venture Exchange under the symbol “EVGN” and the Over-The-Counter exchange (“OTCQX”) under the symbol “EVGIF”.



EverGen’s ~40 employees, all based in Canada, are bound by our Code of Conduct² which serves as a guide on ethical business practices and behaviour and provides guidance and direction to enable all EverGen employees and representatives to analyze situations and apply sound and ethical judgments in the conduct of EverGen’s business.

EverGen combines anaerobic digestion and biogas upgrading to produce RNG, primarily by converting agricultural waste from local dairy farms as well as industrial, commercial and institutional waste, and processes inbound organics, yard waste and biosolids for a contracted tipping fee to produce high-quality organic compost and soils for farmers, gardeners and developers. A supply chain includes the suppliers (direct and indirect) of all goods and service that contribute to the production of goods produced, sold, distributed or imported by the entity, starting from acquiring the raw materials and finishing at the final

¹ <https://www.evergeninfra.com/our-values>
² <https://www.evergeninfra.com/corporate-governance>

product. A supply chain does not include end users or customers that purchase goods or services. For EverGen, a traditional supply chain does not exist as the organic waste used to produce RNG, compost and soil are provided by customers purchasing a disposal service from EverGen, and as such, our supply chain is limited to sourced transportation of organic waste and other minor inputs acquired and added to the production process alongside organic waste, as well as the equipment used in the production process.



RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

According to the Responsible Sourcing Tool³ and the U.S. State Department 2023 Trafficking in Persons Report⁴, employees in the renewable energy sector in Canada, where we operate, are at low risk for modern slavery. We recognize that we may be indirectly linked to the risk of modern slavery as a result of our business activities including agriculture and transportation.

EverGen manages modern slavery risk through a variety of policies, processes and practices, which are outlined in this Statement.

POLICIES AND DUE DILIGENCE PROCESSES

EverGen is committed to the highest standards of business practices and to conducting our business ethically, legally and responsibly and in an inclusive way. We believe that good governance is the essential foundation of a respectful and inclusive culture. The Nomination, Governance Human Resources and Compensation committee of the board of directors recommends individuals for election or re-election as directors, oversees the process for evaluating board committee and director effectiveness, and oversees management of culture and conduct at EverGen, including breaches of our Code of Conduct.

³ <https://www.responsiblesourcingtool.org/>

⁴ https://www.state.gov/wp-content/uploads/2023/09/Trafficking-in-Persons-Report-2023_Introduction-V3e.pdf

POLICIES

a) Code of Conduct

At EverGen, we are committed to treating all individuals with respect and recognizing basic human rights. We also actively seek to do business with third parties who follow similar principles. We respect and comply with all applicable wage and working hour laws in the locations where we operate. We expect that our suppliers and other business partners will uphold our commitment to freedom of association, and appropriate wages and working hours for all employees.

EverGen's Code of Conduct guides and governs our operations and forms the basis for all of our relationships. Under the Code, EverGen is committed to the highest standards of business practices and to conducting our business ethically, legally and responsibly and in an inclusive way. The Code and its related policies guide each and every employee and the Board of Directors, as well as EverGen's representatives in EverGen's business practices and behaviors. It also lays the foundation for how we work together in a respectful, transparent and fair environment. Actual or possible violations of our Code of Conduct, including with respect to human rights are required to be reported and are grounds for disciplinary action up to and including immediate termination of employment and possible legal prosecution.

b) Culture

To build and maintain the trust of our clients, employees, communities and shareholders, the Board establishes the tone from the top and sets the standards of conduct as set out in our Code of Conduct.

c) Risk policies

EverGen's management is committed to proactively monitoring, and where possible, mitigating risk. We define environmental and social risk as the potential for an environmental and social issue associated with us, a customer, transaction, product, supplier or activity to have a negative impact on us, including our financial position, operations, legal and regulatory compliance, or reputation. It refers to the risk that we face as a result of the way we, a supplier or a customer manages environmental and social issues or relationships with stakeholders and communities.

We are developing a policy on Environmental (including climate) and Social Risk (E&S Risk Policy) to serve as the foundation for our approach to managing E&S risks arising from our activities. It will outline our principles for E&S risk management and will set out standards for how E&S risks arising from our activities are identified, assessed, measured, managed, mitigated, monitored and reported.

DUE DILIGENCE

We have risk assessment procedures in place for suppliers. We assess suppliers at the inception of the business relationship and have processes in place to track changes in their risk profiles on an ongoing basis and identify negative news. If a supplier is flagged for human rights risk, they will be subject to enhanced due diligence. EverGen aims to prevent and mitigate adverse impacts we may be directly linked to by taking appropriate action to mitigate such risks, which may include exercising leverage in our business relationships.

REMEDIATION

Our Code of Conduct requires all employees, independent contractors and agents to report actual or possible misconduct. Employees and contract workers are encouraged to speak to their manager, Human Resources or report through the Whistleblower Policy⁵ so issues can be addressed quickly and objectively. The Whistleblower Policy outlines the policies available to all employees, contractors and agents to report

⁵ https://www.evergeninfra.com/files/ugd/7f53af_a1d56456de544426b970609b165245d2.pdf

misconduct that may violate our Code of Conduct, policies and laws or is otherwise unethical and could put EverGen at risk. EverGen upholds a strict commitment to non-retaliation.

TRAINING

Understanding and complying with the Code of Conduct is a condition of working at EverGen, and employees must complete the Code of Conduct acknowledgment annually.

ASSESSING EFFECTIVENESS

We intend to continue to assess and refine indicators to measure our success in operationalizing the commitments in our Code of Conduct and continuously improve our approach to human rights.

We conduct ongoing screening of all suppliers, which allows us to baseline a supplier's risk profile and subsequently flag and assess certain activities. Through such supplier screenings, as well as our policies and processes relating to internal conduct, no evidence of modern slavery – including forced labour or child labour – or human trafficking incidents, or loss of income as a result of steps taken to eliminate modern slavery or human trafficking have been identified in 2023 and thus there has not been a basis to take remedial steps regarding such matters.

CONCLUSION

EverGen is committed to preventing slavery and human trafficking from taking place in our businesses and in our supply chains. We will continue to review our policies, procedures and practices periodically to determine any enhancements we can make to help prevent modern slavery and human trafficking.

APPROVAL

This Statement was approved by the board of directors of EverGen on May 31, 2024

ATTESTATION PURSUANT TO SECTION 11 OF THE CANADIAN ACT

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities subject to the Canadian Act. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.



Mischa Zajtmann
Chief Executive Officer
EverGen Infrastructure Corp.
May 31, 2024