

Greenlane Renewables Inc.

**Annual Report to the
Minister of Public Safety
and Emergency Preparedness
for the
Fiscal Year 2024
on
Bill S-211, Fighting Against
Forced Labour and Child
Labour in Supply Chains Act**



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Introduction

About Greenlane Renewables Inc.

Greenlane Renewables Inc. (Greenlane) is driving change: accelerating the energy transition to a net-zero emissions economy.

Greenlane is cleaning up two of the largest and most difficult-to-decarbonize sectors of the global energy system: the natural gas grid and the transportation sector.

As a pioneer and leading specialist in biogas upgrading, we have been actively contributing to the decarbonization of our planet for over 35 years with more than 355 systems deployed into 28 countries. We transform biogas generated from organic waste into high-quality grid-ready renewable natural gas (RNG), from a wide range of sources such as landfills, sugar mills, dairy farms, wastewater, and food waste. Greenlane is transforming energy production and creating new, sustainable revenue streams for its customers – all while dramatically reducing carbon emissions. Partner with us. Let's accelerate the energy transition together. For further information, please visit www.greenlanerenewables.com.

Greenlane's Commitment to Prevent and Reduce Risks of Forced Labour and Child Labour

At Greenlane, we prioritize human rights in all aspects of our operations. Recognizing the serious risks of forced labour and child labour in global supply chains, we are committed to their prevention and reduction.

Through assessment and ongoing engagement with suppliers, we ensure compliance with international labor standards and condemn exploitation. Transparency and collaboration with stakeholders drive continuous improvement in our practices, raising industry standards.

Our commitment to ethical sourcing reflects our core values, shaping a supply chain that is responsible and sustainable for a better future.



Identifying Information

1. ***This report is for which of the following? (Required)**
Entity
2. ***Legal name of reporting entity. (Required)**
Greenlane Renewables Inc.
3. ***Financial reporting year (Required)**
2024
4. ***Is this a revised version of a report already submitted this reporting year? (Required)**
No
 - 4.1 ***Identify the date the original report was submitted. (Required)**
Not applicable
 - 4.2 ***Describe the scope and changes made to the original submission, including the sections of the original report that were revised or any changes made to questionnaire responses.**
Not applicable
5. **For entities only: Business number(s) (if applicable):**
76970 4719
6. **For entities only: *Is this a joint report? No**
 - 6.1 ***If yes, identify the legal name of each entity covered by this report.**
Not applicable
 - 6.2 **Identify the business number(s) of each entity covered by this report (if applicable).**
Not applicable
7. **For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**
No
 - 7.1 ***If yes, indicate the applicable law(s). Select all that apply.**
Not applicable
8. **For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)**
 - Listed on a stock exchange in Canada - Yes
 - Canadian business presence (select all that apply):
 - Has a place of business in Canada - Yes
 - Does business in Canada - Yes
 - Has assets in Canada - Yes
 - Meets size-related thresholds (select all that apply):



- Has at least \$20 million in assets for at least one of its two most recent financial years - Yes
- Has generated at least \$40 million in revenue for at least one of its two most recent financial years - Yes
- Employs an average of at least 250 employees for at least one of its two most recent financial years - No

9. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply.

- Agriculture, forestry, fishing and hunting - No
- Mining, quarrying, and oil and gas extraction - No
- Utilities - No
- Construction - No
- Manufacturing - No
- Wholesale trade - No
- Retail trade - No
- Transportation and warehousing - No
- Information and cultural industries - No
- Finance and insurance - No
- Real estate and rental and leasing - No
- Professional, scientific and technical services - No
- Management of companies and enterprises - No
- Administrative and support, waste management and remediation services - No
- Educational services - No
- Health care and social assistance - No
- Arts, entertainment and recreation - No
- Accommodation and food services - No
- Other services (except public administration) - No
- Public administration - No
- Other, please specify: Renewable energy, specifically renewable natural gas.

10. For entities only: *In which country is the entity headquartered or principally located?
Canada

10.1 If in Canada: *In which province or territory is the entity headquartered or principally located?
British Columbia

11. For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation?
Not applicable.

11.1 *If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply.
Not applicable.

11.2 *If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located?
Not applicable.



Annual Report

Annual Report to the Minister of Public Safety and Emergency Preparedness for the Fiscal Year 2024 on Forced Labour in Canadian Supply Chains

Questions marked with an asterisk (*) are mandatory.

1. ***What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

- Mapping activities **Yes**
- Mapping supply chains **Yes**
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains **Yes**
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains...**No**
- Developing and implementing an action plan for addressing forced labour and/or child labour **No**
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily **Yes**
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour **Yes**
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains **Yes**
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour **Yes**
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains **No**
- Developing and implementing child protection policies and processes **Yes**
- Developing and implementing anti-forced labour and/or -child labour contractual clauses **Yes**
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists **No**
- Auditing suppliers **Yes**
- Monitoring suppliers **Yes**
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour **No**
- Developing and implementing grievance mechanisms **No**
- Developing and implementing training and awareness materials on forced labour and/or child labour **Yes**
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour **No**
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour **Yes**



- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour **No**
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks **No**
- Information not available for this reporting period **No**
- Other, please specify: **No**

2. **Please provide additional information describing the steps taken (if applicable)**

The following provides additional information respecting steps undertaken by Greenlane in 2024 to prevent and reduce the risks that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Greenlane or of goods imported into Canada by Greenlane:

Developing and Implementing relevant policies and processes: In 2024 Greenlane reviewed its procurement and human rights related policies and procedures. It adopted and implemented enhanced due diligence processes to assess Greenlane's supply chain to ensure that we do not do business with suppliers that use forced labour or child labour, based on the UN Guiding Principles on Business and Human Rights.

- Supplier Qualification Procedure
- Preventing the Use of Forced or Child Labour in the Supply Chain
- Talent Acquisition Procedure
- Reporting on Preventing the Use of Forced or Child Labour in the Supply Chain

Training and Awareness Materials: In 2024, Greenlane also rolled out a new employee training on the Prevention of Forced Labour or Child Labour in the Supply Chain. This was delivered as an in-person training to all supply chain employees to enable active discussion, and it was recorded for inclusion in Greenlane's mandatory annual compliance training and certification, completed by all employees.

3. ***Which of the following accurately describes the entity's structure?**

Corporation

4. ***Which of the following accurately describes the entity's activities? Select all that apply.**

- Producing goods (including manufacturing, extracting, growing and processing):
 - in Canada **Yes**
 - outside Canada **Yes**
- Selling goods:
 - in Canada **Yes**
 - outside Canada **Yes**
- Distributing goods:
 - in Canada **Yes**
 - outside Canada **Yes**



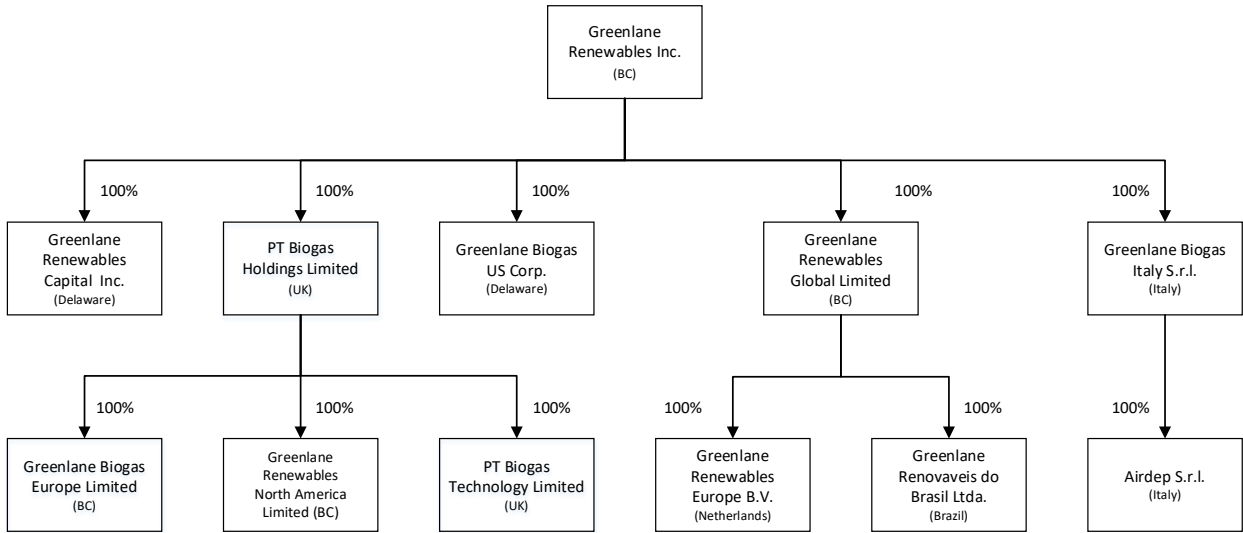
- Importing into Canada goods produced outside Canada **Yes**
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada **Yes**

5. **Please provide additional information on the entity’s structure, activities and supply chains**

Greenlane’s Corporate Structure

Greenlane Renewable Inc.’s business is carried on through its various subsidiaries. The following chart illustrates, as of 31 December 2024, the company’s material subsidiaries, including their respective jurisdiction of incorporation and percentage of voting securities in each that are held by the company either directly or indirectly:

Table 1. Material Subsidiaries Chart



Greenlane’s Activities

Overview of Business

Greenlane is at the forefront of the energy transition, tackling two of the most challenging sectors to decarbonize: the natural gas grid and the commercial transportation sector. As a leading global technology provider, we specialize in transforming biogas from organic waste to create high-value, grid-ready renewable natural gas (RNG). Our advanced solutions marketed and sold by the Company under its Greenlane Cascade™ and Airdep product brands, enable the production of low-carbon and carbon-negative RNG from a wide range of sources such as landfills, sugar mills, waste water treatment plants, dairy farms and food waste.



With over 35 years’ industry experience, Greenlane is a pioneer and leading specialist in biogas desulfurization and biogas upgrading systems. To the Company’s knowledge, Greenlane is the only company offering and actively deploying the three most popular biogas upgrading technologies -water wash, pressure swing adsorption, and membrane separation – alongside proprietary biogas desulfurization and air deodorization technology. Greenlane’s capital light business model leverages outsourced manufacturing of its biogas upgrading systems, in-house manufacturing of its biogas desulfurization and air deodorization products and an extensive global supply chain for key components.

From system delivery to commissioning, performance testing and ongoing maintenance and aftercare, Greenlane ensures seamless integration and long-term operational success. With over 355 systems deployed into 28 countries - including for many of the largest RNG production facilities in the world – Greenlane continues to drive innovation and accelerate the transition to a net-zero emissions economy.

As of 31 December 2024 Greenlane and its wholly-owned subsidiaries had 92 employees and 6 contractors, of which 65 are in Canada, 23 in Italy, 5 in Brazil, 2 in New Zealand, 2 in the United States, and 1 in France.

Greenlane’s Supply Chains

Greenlane has a mix of supplier contracts, some of which are for specific projects while others are standing supply, service or pricing agreements. In 2024, approximately 69% of Greenlane’s suppliers were located in North America, approximately 24% were located in Europe, with the balance of suppliers in Brazil. In any given year, the split among suppliers in different geographies can shift according to the geographic split in Greenlane’s sales and other changes in Greenlane’s business.

Table 2 below shows a breakdown of Greenlane’s suppliers and the percentage spend by country in 2024.

Table 2. 2024 Percentage of Spend by Country and Supplier

Supplier Region/Countries	% of Total # of Suppliers	% by \$ Spent
North America*	69%	81%
Europe	24%	3%
Brazil	7%	16%

* North America includes Mexico, which accounts for 1.75% of total \$ spent.

6. ***Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)**
- Yes (as of FY2024)



6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems **Yes**
- Identifying and assessing adverse impacts in operations, supply chains and business relationships **Yes**
- Ceasing, preventing or mitigating adverse impacts **Yes**
- Tracking implementation and results **No**
- Communicating how impacts are addressed **No**
- Providing for or cooperating in remediation when appropriate **No**

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable).

Greenlane has adopted and implemented the following policies and procedures to assess Greenlane's supply chain to ensure that we do not do business with suppliers that use forced labour or child labour, based on the UN Guiding Principles on Business and Human Rights.

- **PRC-SC-001- Supplier Qualification**
This procedure describes the process for performing the qualification of new suppliers, utilizing prescribed steps and methods to accurately assess if the identified supplier meets the criteria required to be added to the Greenlane-approved suppliers list.
 - **FRM-SC-001 – Initial Inquiry Form**
An initial form used for obtaining general information on new vendors.
 - **FRM-SC-004 - Supplier Audit Report**
Site audit form for assessing technical, quality and regulatory compliance of Greenlane vendors.
 - **FRM-SC-010 - Supplier Human Rights Questionnaire**
Supplier Human Rights Questionnaire is used to identify and assess the extent to which suppliers may be a risk of using forced labour or child labour in their business or supply chains.
- **PRC-SC-002 - Prevention of Forced Labour or Child Labour in the Supply Chain**
The purpose of this procedure is to describes the due diligence process used by Greenlane to identify the parts of Greenlane's supply chain that carry a risk of forced labour and child labour and the preventive measures taken to assess and manage the risks.
- **PRC-SC-003 - Reporting on Preventing the Use of Forced or Child Labour in the Supply Chain**
This procedure details the content and format requirements for submitting the annual report to the Government of Canada Minister of Public Safety on measures taken to prevent forced or child labour in Greenlane's supply chain.



- PRC-HR-002 - Talent Acquisition Procedure
This procedure describes the process for talent acquisition at Greenlane Renewables Inc., including job postings, interview procedures, and selection processes to ensure the recruitment of qualified candidates.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

- The sector or industry it operates in **No**
- The types of products it produces, purchases or distributes **No**
- The locations of its activities, operations or factories **No**
- The types of products it sources **No**
- The raw materials or commodities used in its supply chains **No**
- Tier one (direct) suppliers **No**
- Tier two suppliers **No**
- Tier three suppliers **No**
- Suppliers further down the supply chain than tier three **No**
- The use of outsourced, contracted or subcontracted labour **No**
- The use of migrant labour **No**
- The use of forced labour **No**
- The use of child labour **No**
- None of the above
- Other, please specify **No**

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.

- Agriculture, forestry, fishing and hunting **No**
- Mining, quarrying, and oil and gas extraction **No**
- Utilities **No**
- Construction **No**
- Manufacturing **No**
- Wholesale trade **No**
- Retail trade **No**
- Transportation and warehousing **No**
- Information and cultural industries **No**
- Finance and insurance **No**
- Real estate and rental and leasing **No**
- Professional, scientific and technical services **No**
- Management of companies and enterprises **No**
- Administrative and support, waste management and remediation services **No**
- Educational services **No**
- Health care and social assistance **No**
- Arts, entertainment and recreation **No**



- Accommodation and food services **No**
- Other services (except public administration) **No**
- Public administration **No**
- **None of the above**
- Other, please specify **No**

10. Please provide additional information on the parts of the entity’s activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable).

Risk Analysis

Greenlane has conducted the following risk analyses of its Suppliers:

U.S. Department of Labor’s “List of Goods Produced by Child Labor or Forced Labor.”

The U.S. Department of Labor’s Bureau of International Labor Affairs provides timely, factual reporting on international child labor and forced labor, including the annual List of Goods Produced by Child Labor or Forced Labor. The List, known as the TVPRA List, is required by the Trafficking Victims Protection Reauthorization Act. The Bureau of International Labor Affairs maintains the TVPRA List primarily to raise public awareness about child labor and forced labor around the world and to promote efforts to eliminate them. The TVPRA List serves as a catalyst for more strategic and focused coordination and collaboration among those working to address these problems. (U.S. Department of Labor, 2022)

This list is a useful tool by which Greenlane can analyze risks within its supply chain. Of the seven countries/regions within which Greenlane procures materials, four (Canada, New Zealand, USA, and Europe) are low enough risk to not be included in the TVPRA List and can be concluded to represent a low risk.

Brazil and Mexico are the only countries with Greenlane’s suppliers on the TVPRA List. See the “2022 TVPRA List by Country produced by the U.S. Department of Labor” table below, showing the details extracted for these countries. The commodities Greenlane procures in these countries do not appear on the List and therefore can also be considered to represent a low risk of production by child labour or forced labour.



Table 3. 2022 TVPRA List by Country

Country	Child Labour	Forced Labor	Child Labour & Forced Labour
Brazil	Acai Berries, Bananas, Beef, Bricks, Cashews, Ceramics, Cocoa, Corn, Cotton, Fish, Footwear, Hogs, Manioc/Cassava, Pineapples, Poultry, Rice, Sheep, Sisal, Tobacco	Garments, Timber	Cattle, Charcoal, Coffee, Sugarcane
Mexico	Beans (green beans), Cattle, Coffee, Cucumbers, Eggplants, Garments, Leather Goods, Melons, Onions, Poppies, Pornography, Sugarcane, Tobacco		Chile Peppers, Tomatoes

Source: U.S. Department of Labor. (2022). "List of Goods Produced by Child Labor or Forced Labor." U.S. Department of Labor.

Walk Free’s Global Slavery Index

Walk Free is an international human rights group working to accelerate the end of all forms of modern slavery. Walk Free is the creator of the Global Slavery Index, the world’s most comprehensive data set on modern slavery. (Walk Free, 2023)

Walk Free’s Global Slavery Index is yet another useful tool by which Greenlane can analyze risks within its supply chain. The table below shows the risk level Walk Free has identified for the countries where Greenlane’s suppliers are based. In all cases, the risk level is low.

Table 4. Estimated Prevalence of People in Modern Slavery by Country

Country	Region	Region Rank	Estimated prevalence of modern slavery (per 1,000 of population)	Risk Level
New Zealand	Asia and Pacific	25	1.6	Very Low
Canada	Americas	25	1.8	Very Low
Europe	Europe	34	3.3	Very Low
USA	Americas	21	3.3	Very Low
China	Asia and Pacific	19	4.0	Low
Brazil	Americas	16	5.0	Low
Mexico	Americas	13	6.6	Low





Risk Mitigation Activities

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

11.1 *If yes, which remediation measures has the entity taken? Select all that apply.

- Not applicable

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable)

- Not applicable

13. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable).

- Not applicable

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- Yes

15.1 *If yes, is the training mandatory?

- Yes, the training is mandatory for all employees.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).

In 2024, Greenlane also rolled out a new employee training on the Prevention of Forced Labour or Child Labour in the Supply Chain. This was delivered as an in-person training to all supply chain employees to enable active discussion, and it was recorded for inclusion in Greenlane's mandatory annual compliance training and certification, completed by all employees.



All employees are required to take mandatory training on preventing forced labour and child labour in the supply chain using training presentation TRN-SC-001 – Prevention of Forced Labour or Child Labour in the Supply Chain.

The purpose of this training is to describe the due diligence processes Greenlane uses to assess our supply chain to ensure that we do not do business with suppliers that use forced labour or child labour

Training is based on new procedure: PRC-SC-002 Prevention of Forced Labour or Child Labour in the Supply Chain and Existing procedure: PRC-SC-001 Supplier Qualification Process

17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?
- Yes

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply.

- Setting up a regular review or audit of the organization’s policies and procedures related to forced labour and child labour. Such evaluation is conducted for all new suppliers as part of the supplier qualification procedure. Standard audit frequency for existing production suppliers is 24 months, being adjusted as needed based on suppliers’ performance index.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).

PRC-SC-002 - Prevention of Forced Labour or Child Labour in the Supply Chain describes the due diligence process used by Greenlane to identify the parts of Greenlane’s supply chain that carry a risk of forced labour and child labour and the preventive measures taken to assess and manage the risks.

- Audit findings

If during the audit of a supplier a non-compliance or potential for non-compliance with forced labour and child labour laws is discovered, the findings will be provided to the supplier in writing using FRM-SC-005 Assessment Report to Supplier. Depending on the severity of the findings one of the following actions will be taken.

 - Where the supplier has been found to use forced labour or child labour in their organization or their supply chain the supplier will immediately be “Not Approved” as a supplier.
 - Where the supplier lacks appropriate controls to prevent the use of forced or child labour in their organization or their supply chain the supplier will be downgraded to being “Provisionally Approved supplier pending successful completion of a corrective action plan within a set timeframe. The plan will include requiring the supplier to establish robust human resources and supply chain policies and practices, implementing a company and supplier code of conduct and establishing their own internal audit and reporting processes. If the supplier fails to or refuses to take all corrective actions within the set timeframe then they will be disqualified as a supplier and Greenlane will take immediate action to qualify one or more alternatives suppliers for the product.



- Monitor for New Risks
 - Given that supply chains and organizations evolve continuously, with companies taking on new suppliers and expanding the range of goods, newly qualified suppliers that have the potential for being a risk will be closely monitored during the first year following qualification and will be subjected to the assessment process as set out in subsection 6.1.2 of this procedure.

Internal staff responsible for procurement and supplier management will provide regular update on vendors' status, including observed or potential compliance issues regarding forced and child labour.

Approval and Attestation

This report has been reviewed and approved by Greenlane Renewables Inc.'s governing body, its Board of Directors.

In accordance with the requirements of BILL S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Greenlane Renewables Inc. 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 Act, for the reporting year listed above."

Full name: Brad Douville
Title: Chief Executive Officer
Date: August 1, 2025

Signature  _____

I have the authority to bind Greenlane Renewables Inc.