

1. Introduction

This report (the “Report”) has been prepared by Anaergia Inc. (“Anaergia”, the “Company”, “we”, “us” or “our”) pursuant to Section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), covering our most recently completed fiscal year which ended December 31, 2025 (the “Reporting Period”), and addresses the measures implemented to prevent and reduce the risk of forced labour or child labour being used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company.

2. Entity structure, activities and supply chains

Anaergia Inc. was incorporated under the *Canada Business Corporations Act* on September 3, 2010. On December 21, 2018, the Company was continued under the *Business Corporations Act* (British Columbia). The Company’s head office is located at 4210 South Service Road, Burlington, Ontario, and there are approximately 270 employees located in North America, Europe and Asia.

The subordinate voting shares (now common shares) of the Company have been listed and posted for trading on the Toronto Stock Exchange under the trading symbol “ANRG” since June 23, 2021.

We have three main segments:

- a. *Capital Sales*. Our Capital Sales segment consists of technology packaged solutions and services to third party customers, predominantly municipalities and project developers, and includes engineering services, proprietary product sales, engineering procurement and construction contracts, or a combination thereof. This segment operates in North America, Europe and Asia.
- b. *Services*. Our Services segment offers third-party Operation and Maintenance (O&M) and field service contracts, with customers that typically include municipalities and project developers that utilize our technology solutions. This segment operates in North America and Europe.
- c. *BOO*. Our Build-Own-Operate (BOO) segment has been building, owning, and operating greenfield or brownfield facilities. The BOO segment operates in North America.

The Company’s operations rely on streamlined processes to strategically procure parts and materials, while continually challenging and developing our supply chain. We expect our suppliers to apply the same principles that we uphold internally, including accountability, innovation, continuous improvement, and commitment to the success of our projects. As part of our evolving supplier evaluation program, we use Dun and Bradstreet to screen our suppliers during onboarding in an effort to identify supply chain risks and eliminate suppliers that do not meet our risk profile.

Our procurement includes components related to solids conveyance, pumping, tankage, process heating, biogas cleaning, and instrumentation and controls, along with various other plant components, all acquired through a competitive bidding process.

We generally source goods and services from within the regions where our projects are located. For our European projects, we source the majority of third-party equipment and services from Western Europe. With respect to our North American and Asian projects, such procurement is generally from suppliers within North America and Asia, respectively. Most of our imports into Canada come from suppliers based in the United States, Italy and Germany, who purchase their own goods from a variety of regions, including China.

3. Policies and due diligence processes

Anaergia recognizes that human rights considerations, often exacerbated by climate-related issues, are having increasingly material impacts on businesses around the world. As a company with strong ethical and sustainability aspirations, we strive to embed responsible business practices into our policies and management systems. Environmental, Social and Governance (“ESG”) risks are addressed by the Board of Directors (“Board”) and executive management, understanding that robust governance is crucial in assessing and managing ESG risks for our business.

During the Reporting Period, forced labour and child labour considerations continued to be a focus of the Board when evaluating risks stemming from our operations and supply chain. Our Directors have decades of experience in the infrastructure, energy and water industries, and thus provide guidance and oversight in navigating the ESG challenges that are a part of working in the environmental technology field.

Our Code of Conduct mandates that all employees remain committed to upholding human rights. We require all employees, as well as the suppliers and contractors that we work with, to comply with all laws and regulations respecting the inalienable rights of all people to live their lives free from social, political or economic discrimination or abuse. The Board continues to support and oversee compliance through our Whistleblower Policy, which

provides a mechanism to report in good faith actual or apparent violations anonymously and with safeguards against retaliation.

In addition, we have implemented a Supplier Code of Conduct in multiple languages that is integrated into our vendor onboarding process and qualification process. As part of onboarding, suppliers are required to comply with anti-slavery and child labour laws and regulations. We also intend to use this onboarding process to identify higher-risk suppliers and apply enhanced, risk-based due diligence measures. All material suppliers of Anaergia are required to sign and acknowledgement the Supplier Code of Conduct.

Our CEO and executive management are responsible for ensuring that the policies adopted by the Board are carried out on a day-to-day basis by all relevant employees and vendors, as applicable. Management also has a role in identifying ESG risks, such as forced labour and child labour, within our operations and supply chain that may impact our business.

Our onboarding of new employees includes obtaining acknowledgments of our Code of Conduct and agreement to adhere to our core values and applicable laws. We strive to establish a culture where employees feel free to express their concerns, including with respect to ethical procurement and labour rights.

4. Forced labour or child labour risk assessment and management

Our executive management monitors risk factors impacting the execution of Anaergia's business strategy. As part of the corporate internal audit functions within our operations, risks of forced labour and child labour are being identified in decision-making relating to procurement of our systems components.

Although we have not identified any specific human rights risks in our activities or supply chain, we recognize that we currently lack comprehensive visibility into the value chains of our primary suppliers. We are committed to further developing our risk management procedures and plan to assess our supply chains to better understand certain risks associated with country-of-origin supply of components for our engineered systems, and in particular the supply chain risks of forced labour and child labour. Given the specific requirements of our components, some of which we source from our affiliates in Italy and Germany but for our North American project most of the supplier as from companies located

within North America, our assessment is expected to indicate our supply chain has limited exposure based on the information available.

Anaergia's policies and governance practices implicitly address forced labour and child labour risks. Our Board discusses forced labour and child labour risks as part of its general risk review and management provides monitoring, oversight, and guidance on execution and plant operation activities globally, which is expected to enable prevention and quick responses to supply chain risks identified. Moreover, measures such as our delegation of authority, monthly project dashboard reviews, and status updates also provide multiple layers for managing supplier's risks.

As the number of Anaergia's operational facilities continues to grow, so will our need for monitoring and prevention of risks associated with suppliers engaged in forced labour and child labour practices. Our Supplier Code of Conduct ensures that our suppliers adhere to the underlying expectations of the Act, as well as other global standards.

5. Remediation measures

Pursuant to our Whistleblower Policy, we have established a program to facilitate the reporting of apparent and perceived misconduct, including matters relating to our Code of Conduct's procurement integrity guidelines. The program is accessible to all Anaergia employees and includes anonymous reporting channel administered by an independent provider (Lighthouse), as well as prohibition of any retaliatory conduct. Oversight of any such reporting is managed by the Chair of the Audit Committee of the Board, in accordance with our Whistleblower Policy.

During the Reporting Period, there were no complaints received pertaining to forced labour or child labour and as a result, Anaergia did not identify any forced labour or child labour in its activities and supply chains. Accordingly, no remediation measures were necessary, nor was there a need to address any potential loss of income for vulnerable families due to the elimination of forced labour or child labour in our activities and supply chains.

6. Training

We recognize the importance of providing our employees with training on forced labour and child labour and we are currently evaluating and identifying the training programs best suited to address these issues effectively. We continuously offer training programs on various human resources topics, such as health and safety and discrimination. Additionally, we ensure that all employees adhere to our values of integrity and respect by signing our Code of Conduct.

7. Assessing effectiveness

We are committed to continuously identifying, assessing, and addressing the risks associated with forced labour and child labour in our operations and supply chains. While we do not currently have formal procedures to evaluate the effectiveness of our measures, we firmly believe that fostering transparency and collaboration with our suppliers through our implementation of our Supplier Code of Conduct will help prevent forced labour and child labour risks in our supply chain. Additionally, we regularly review our policies and practices to assess their effectiveness.

8. Approval and attestation

This report is made pursuant to section 11 of the Act and was approved on May 11, 2026, by the Board of Anaergia, pursuant to paragraph 11(4)(a) of the Act covering Anaergia's most recently completed fiscal year ended December 31, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have the authority to bind Anaergia and I have reviewed the information contained in the report for the Company. 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 indicated above.



Ohad Epschtein (May 25, 2026 12:33:40 GMT+3)

Ohad Epschtein
Executive Chairman
Anaergia Inc.

May 11, 2026