



SUSTAINABILITY POLICY

1. Purpose

This policy confirms the principles which guide Badger Infrastructure Solutions Ltd. and its subsidiaries (individually, together, or collectively, as the context requires **Badger, we** or **our**) in conducting our business in a manner that supports long-term value creation while managing environmental, social, and governance (**ESG**) risks and opportunities. This policy is intended to describe factors Badger considers in making decisions, not to catalogue specific achievements, initiatives, or aspirations, which are addressed separately in Badger's public disclosures and operational programs and procedures (which we review periodically and adjust as appropriate based on business conditions and regulatory developments).

2. Scope and Application

This policy applies to all of Badger's directors, officers, and employees, and informs expectations for contractors, consultants, customers, suppliers, and other individuals conducting business with Badger where appropriate. It should be read in conjunction with Badger's Code of Conduct and Badger's other policies, programs and procedures, which prevail in the event of any inconsistency.

3. Guiding Commitments

Badger's approach to sustainability is grounded in the following overarching commitments:

- conducting business ethically, lawfully, and with integrity;
- prioritizing the health and safety of our people, customers, and the communities in which we operate;
- managing environmental impacts responsibly;
- respecting human rights and fostering a workplace based on dignity, inclusion, and opportunity; and
- maintaining strong governance, transparency, and accountability in decision-making.

These commitments are integrated into our corporate strategy, risk management processes, and day-to-day operations.

4. Environmental Stewardship Principles

Badger is committed to responsible environmental management. We will:

- comply with all applicable environmental laws in the jurisdictions in which we operate;
- seek to minimize waste and pollution, and manage customer materials responsibly throughout their lifecycle;
- use natural resources, including water and energy, efficiently and with due regard for availability and environmental impact;

- identify, assess, and manage environmental risks associated with our operations, including those related to climate and extreme weather; and
- support innovation and continuous improvement that enhances environmental performance over time.

5. Social Responsibility and Safety Principles

Health and Safety

Badger is committed to providing a safe and healthy work environment. We will:

- empower workers to identify hazards, stop unsafe work, and report concerns without fear of retaliation; and
- maintain training, incident investigation, corrective action and other programs and procedures designed to prevent incidents and continuously improve safety performance.

People, Inclusion, and Human Rights

Badger respects the dignity and rights of all individuals. We will:

- uphold applicable human rights laws and maintain zero tolerance for forced labour, child labour, and human trafficking;
- promote fair employment practices, merit-based opportunity, and a workplace free from discrimination, harassment, and violence;
- support inclusion and respect in the workplace and engage constructively with the communities in which we operate, including Indigenous communities; and
- provide mechanisms for employees and stakeholders to raise concerns and seek resolution in good faith.

6. Governance and Ethical Business Conduct

Badger's sustainability commitments are supported by strong governance and ethical conduct. We will:

- act in accordance with Badger's Code of Conduct and all applicable laws and regulations;
- maintain clear oversight and accountability for ESG-related risks and opportunities through management and Badger's Board of Directors;
- integrate sustainability considerations into enterprise risk management and strategic planning where material to the business;
- promote transparency and accuracy in public disclosures, including sustainability-related reporting; and
- maintain confidential and accessible channels for reporting concerns, supported by protections against retaliation.

7. Stakeholder Engagement

Badger recognizes that meaningful engagement with stakeholders supports informed decision-making and long-term resilience. We will:

- consider stakeholder perspectives when assessing material risks and opportunities;
- engage with employees, customers, investors, suppliers, and communities in a manner that is respectful and constructive; and
- communicate sustainability-related information in a balanced and responsible manner.

8. Implementation and Accountability

Management is responsible for implementing this policy through appropriate programs and procedures. Badger's Board of Directors, directly and indirectly through its committees, provides oversight of sustainability-related matters consistent with its governance responsibilities. This policy does not create contractual rights and does not replace or override applicable laws or regulations.

9. Review

This policy is reviewed periodically to ensure it remains appropriate in light of regulatory developments, evolving stakeholder expectations, and Badger's business strategy.

10. Modification

This Policy may be modified from time to time by the Board in its sole discretion.

Approved by the Board: Yes
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Last reviewed: N/A
Las amended: N/A