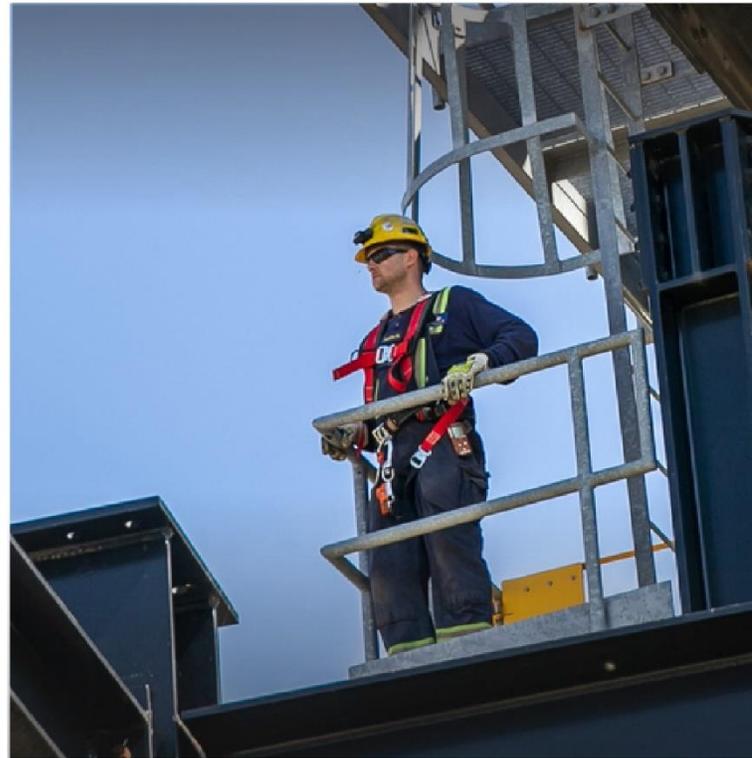




2023 MODERN SLAVERY REPORT

*FIGHTING AGAINST FORCED LABOUR
AND CHILD LABOUR IN SUPPLY CHAINS*

MAY 2024





Introduction

This Modern Slavery Report has been prepared in line with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the reporting year of January 1, 2023 to December 31, 2023. It is a joint report for Gibson Energy Inc. and its subsidiaries¹ that have a reporting obligation under the Act (collectively, "Reporting Entities"). All information contained in this report is applicable on a Reporting Entity-wide basis and where this report refers to "Gibson", "the Company", "we", "our" or "us", it is a reference to all Reporting Entities. Gibson is not subject to reporting requirements under supply chain legislation in other jurisdictions.

This is Gibson's first annual report in accordance with the newly implemented Canadian modern slavery reporting requirements, which provides us an important opportunity to reflect on our efforts to date, share our progress and initiatives and acknowledge opportunities to improve. We recognize our responsibility in shaping a better tomorrow for all stakeholders, including by respecting internationally recognized human rights. Modern slavery, which includes forced labour and child labour, is a global issue and we are committed to playing a role in identifying and mitigating the potential risks of modern slavery throughout our business and supply chain. While there have been no identified incidents or complaints of modern slavery across our operations in 2023, we remain dedicated to continuous improvement.

About Gibson

OVERVIEW AND STRUCTURE

Gibson is a leading liquids infrastructure company that has played an integral role in the North American energy value chain for over 70 years. The Company is focused on delivering infrastructure and midstream solutions to customers in the energy industry in a responsible and sustainable manner. Headquartered in Calgary, Alberta, our principal business consists of the storage, optimization, processing and gathering of liquids and refined products. We provide best-in-class connectivity between energy producers and the markets we serve through our infrastructure and marketing segments, with a focus on creating valuable market access solutions for our customers.

The Company was incorporated as "Gibson Energy Inc." under the Alberta Business Corporations Act in 2011 and is listed on the Toronto Stock Exchange (TSX:GEI). Gibson Energy Inc. has several subsidiaries in Canada and the United States (the "U.S."), including the Reporting Entities covered by this report. The Company's head office and registered office is located at 1700, 440-2nd Avenue, S.W., Calgary, Alberta, Canada T2P 5E9.

At Gibson, we believe our competitive advantage lies in the strengths and talents of our dedicated employees. Our permanent workforce currently includes approximately 509 full-time employees and 5 part-time employees across Canada and the U.S.

To learn more, please visit www.gibsonenergy.com.

ACTIVITIES AND OPERATIONS

Gibson's operations occur across Canada and the U.S. and are comprised of two integrated segments:

- 1) **Infrastructure** is comprised of a network of infrastructure assets that includes terminals, a marine export facility, rail loading and unloading facilities, gathering pipelines, a diluent recovery unit (DRU) and a crude oil processing facility. The primary facilities within this segment include the Hardisty, Edmonton and Gateway Terminals, which are the principal hubs for aggregating and exporting liquids and refined products out of the Western Canada Sedimentary Basin and the

¹ Entities that meet the reporting obligation requirements set out in Part 2 of the Act and therefore are covered by this joint report include: Gibson Energy Inc., Gibson Energy Infrastructure Partnership, and Moose Jaw Refinery Partnership, of which we hold 100% ownership interest and Hardisty Energy Terminal Limited Partnership, of which we hold a 50% interest as operator of the joint-venture Diluent Recovery Unit. These entities are referred to herein as the "Reporting Entities".

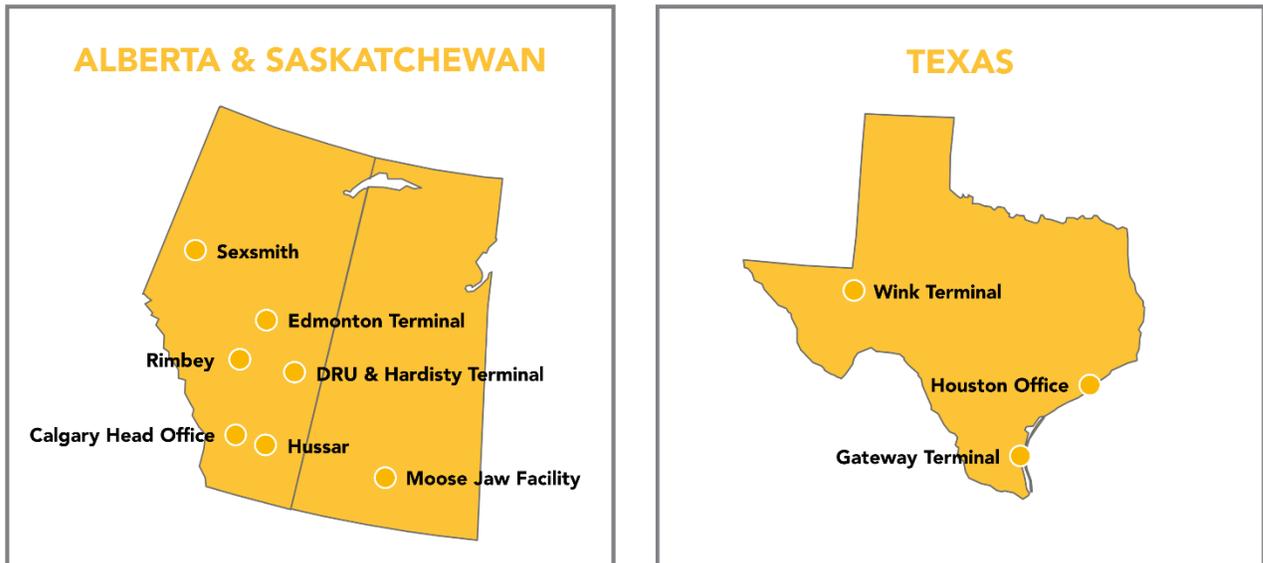


Permian and Eagle Ford Basins, gathering pipelines connected to the Hardisty Terminal, gathering pipelines located in the U.S. and a crude oil processing facility in Moose Jaw, Saskatchewan. In addition, our Biofuels Blending Project at the Edmonton Terminal includes additional infrastructure to facilitate the storage, blending, and transportation of renewable diesel.

- 2) **Marketing** involves the purchasing, selling, storing and optimizing of hydrocarbon products as part of supplying the Moose Jaw Facility and marketing its refined products, as well as part of supplying and driving volumes through the Company's key infrastructure assets. The hydrocarbon products would include crude oil, natural gas liquids, road asphalt, roofing flux, frac oils, light and heavy straight run distillates, vacuum gas oil and an oil-based drilling mud product. The Marketing segment's opportunities are typically location, quality or time-based. The Marketing segment sources most of its hydrocarbon products from Western Canada and markets those products throughout Canada and the U.S.

Gibson also imported goods into Canada in 2023 as part of our ongoing operations.

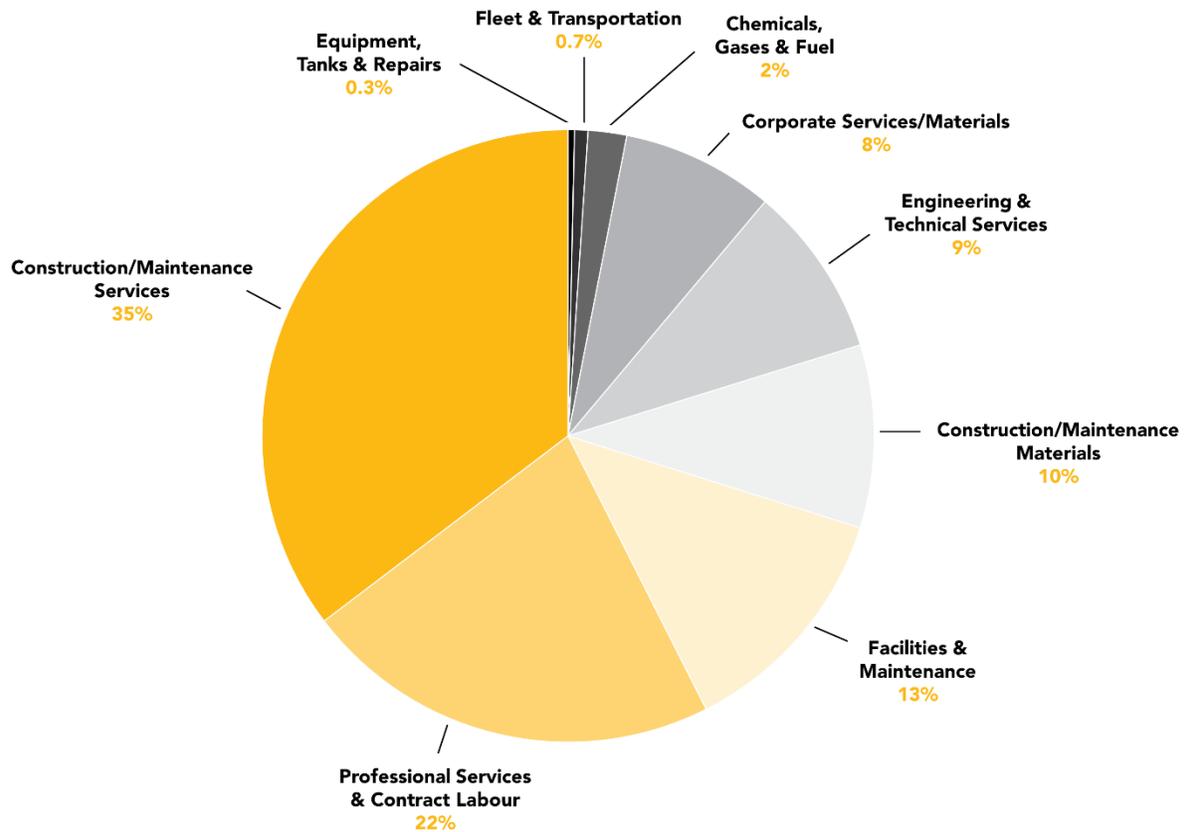
The following maps outline Gibson's main operational asset locations as of the publication of this report.



SUPPLY CHAIN

Gibson's suppliers, contractors and service providers are an important extension of our business and play a key role in helping us achieve our business objectives. Our supply chain includes companies that provide goods and services to our organization and the assets that we operate.

Given the presence of our operations being only in Canada and the U.S., the majority of our supply chain spend is focused in these countries. In 2023, Gibson did business with just over 1,000 Tier 1 suppliers, of which approximately 79% were located in Canada and approximately 21% in the U.S. Gibson's supply chain spend for the reporting year is broken down across the categories of spend as shown in the following figure.



Please note that suppliers for our Gateway Terminal in Texas are not included as although we purchased the terminal in August 2023, we did not fully transition the operations and maintenance functions for the terminal to Gibson until January 1, 2024.

Steps Taken to Prevent and Reduce Risks of Modern Slavery

During the reporting year, Gibson has taken several steps to prevent and reduce the risks of forced labour and child labour in our operations and supply chain. These steps are summarized as follows, with further details shared throughout this report:

- Developed Supply Chain Human Rights Training to ensure key employees understand what modern slavery is and to become familiar with Gibson's risks and due diligence processes
- Engaged the services of external counsel to review the impact of the Act on Gibson and advise on best practices, conduct a gap assessment and develop a roadmap for continuous improvement
- Conducted an initial risk assessment of our Tier 1 supplier spend and identified supplier categories that may be at an increased risk for modern slavery issues
- Assessed suppliers on sustainability and human rights topics through our supplier prequalification and request for proposals (RFP) due diligence processes





Policies and Governance

Gibson is committed to high standards of governance and ethical conduct in all activities as our reputation for honesty and integrity is key to the success of the business. We recognize our responsibility to uphold high standards of ethical business conduct and address human rights issues related to our operations. Our company has established a clear and robust policy framework that explicitly prohibits forced labour and child labour throughout our operations and supply chains. We have embedded human rights and modern slavery commitments in our *Code of Conduct and Ethics*, *Supplier Code of Conduct and Ethics Policy* and *Labour and Human Rights Policy*. Our commitments within these policies are informed by internationally recognized guidelines including the United Nations (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) conventions such as the ILO Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Gibson takes an enterprise-wide approach to our governance policies and programs, which are applied consistently across the Company and its subsidiaries. These policies are overseen and by Gibson's Board of Directors (the "Board") and are regularly reviewed by the Board to ensure continued alignment with laws, standards and best practices. In 2023, no breaches of these policies, or any other Gibson policy, were identified. The policies are publicly available on our website at www.gibsonenergy.com.

CODE OF CONDUCT AND ETHICS

Gibson's *Code of Conduct and Ethics* (the "Code") sets the foundation for our approach to operating ethically and with integrity. The Code specifically addresses the Company's expectations for directors, officers, employees, contractors, consultants and suppliers regarding compliance with laws, conflict of interest, confidentiality and disclosure, labour and human rights, environmental regulations, health and safety, use of company property and resources, retention of documents and records and reporting financial transactions. The Code also provides information on how non-compliance can be reported and how such reports will be managed. Embedded within the Code are our Gibson Way values, which are the guiding principles and behaviors that govern workplace conduct and encapsulate who we are as an organization. The Board reviews the Code annually and is responsible for monitoring compliance on an ongoing basis.

SUPPLIER CODE OF CONDUCT AND ETHICS POLICY

Our *Supplier Code of Conduct and Ethics Policy* (the "Supplier Code") expands on the *Code of Conduct and Ethics* and explicitly outlines Gibson's expectations for all suppliers and how we expect our suppliers to uphold our values in their conduct of business. The Supplier Code expressly prohibits suppliers from using forced labour, child labour, modern slavery and human trafficking under any circumstances. As part of our supplier contracting, compliance and onboarding program, all suppliers are required to adhere to our Supplier Code as a requirement to do business with Gibson. The Supplier Code was approved by the Board in July 2021, and was embedded in all new contracts issued after this date. We ensure continued awareness of the Supplier Code by communicating it to all suppliers as well as making it available on our external and internal websites. Failure of suppliers to comply with the Supplier Code or any associated policies, practices and guidelines of Gibson may result in disciplinary action up to and including termination of the business relationship and/or legal action.

LABOUR AND HUMAN RIGHTS POLICY

Gibson has established a *Labour and Human Rights Policy* (the "Policy"), which expands on the labour and human rights commitments outlined in the Code and the Supplier Code. This Policy is applicable to the Company's directors, officers, employees, partners, contractors, consultants and suppliers across our operations and includes a specific commitment to prohibit all forms of child labour and forced labour.



GRIEVANCE MECHANISM

As part of our commitment to upholding the highest standards of governance and ethics, Gibson has established robust and effective grievance mechanisms. We believe it is crucial to maintain a workplace where concerns or complaints regarding questionable business practices can be raised without fear of any discrimination, retribution or harassment. Gibson's *Whistleblower Policy* outlines the guidelines and procedures for stakeholders, such as employees, suppliers, community members, officers and directors, to raise potential concerns. Our confidential grievance reporting line, the *EthicsLine*, is publicly available and can be accessed via internet or telephone for any individual to anonymously raise a complaint related to our business conduct, compliance with laws and regulations and/or policy violations, which would include concerns about modern slavery if they arise. Complaints received through our *EthicsLine* are directed to the Chair of the Board and the Chair of the Audit Committee for review.



Our *EthicsLine* provides an anonymous and confidential reporting line, available 24 hours a day, 7 days a week. Call toll free at **1-888-475-0595** or report online at: <https://gibsonenergy.ethicspoint.com>

Training and Education

We believe that understanding and effectively managing modern slavery risks requires a collaborative approach with our suppliers, employees and other stakeholders. Gibson acknowledges the importance of knowledge sharing and capacity building for our employees and suppliers to understand, identify and manage the risks of modern slavery in our operations and across our value chain.

EMPLOYEE TRAINING

Key members of Gibson's teams responsible for supply chain and procurement, and those who work closely with suppliers are provided in-depth human rights and modern slavery training. During the reporting period, we internally developed our Supply Chain Human Rights Training, which was delivered subsequent to the reporting period in March 2024, and was mandatory for employees at all levels in our Supply Chain Management (SCM), Sustainability and Legal teams. The training was made optional for all other Gibson personnel as well. In total, we had 58 employees complete the training in March 2024, which includes 100% of our SCM, Sustainability and Legal team employees and over 11% of our total workforce.

The training was administered in a hybrid fashion, both in-person for those in our Calgary head office to attend, as well as virtually for employees in other geographic areas. Going forward, we also commit to assigning the training through our Learning Management System (LMS) during the onboarding process for any new employees or contract workers joining our SCM, Legal or Sustainability teams. Topics covered include: the definition and significance of modern slavery, forced labour and child labour; the Act and its implications for Canadian businesses; Gibson's modern slavery risk assessment and due diligence processes; and responsibilities of Gibson employees.

In 2023, Gibson also delivered our Legal Policy Compliance Course in which certain policies, including the Code and Whistleblower Policy, must be reviewed and certified in our LMS by all full-time and part-time employees as well as contract workers upon hire, and on an annual basis thereafter. The goal of this course is to ensure continued awareness of, and compliance with, the policies and understanding of Gibson's expectations for ethical business conduct as well as to ensure employees have the tools to, among other things, properly navigate certain situations and risks.



SUPPLIER ENGAGEMENT

We believe that collaboration with our suppliers is key as we believe that we can leverage our strong working relationships to positively engage on key issues. We actively engage with our suppliers to and raise their awareness on sustainability topics and conduct formal stewardship meetings with several suppliers on an annual basis. In 2023, we hosted our second annual Supplier Forum for several key suppliers to engage in discussions on our sustainability expectations, share current and emerging best practices and discuss upcoming initiatives. The Supplier Forum was attended by 11 of our Canadian engineering and construction suppliers that work at our facilities in Alberta and Saskatchewan, which were chosen because they were the largest spend suppliers..

In April 2024, we held a targeted supplier engagement and training session with key suppliers we identified based on the results of our supply chain risk assessment. The Gibson team delivered training on modern slavery to these suppliers at an in-person forum. The goal of the event was to ensure suppliers understood the signs of modern slavery, to encourage capacity building, and to communicate our policy expectations and grievance mechanisms. Key suppliers of critical materials and services were in attendance, as well as employees from Gibson's SCM team.

We are committed to continuing to engage with our suppliers on sustainability and modern slavery topics, and aim to continue increasing our engagement with high-risk suppliers.

Risk Assessment and Management

OPERATIONS RISK

We consider the risk of modern slavery within our operations to be very low as we only operate in Canada and the U.S and comply with all applicable laws and regulations in these jurisdictions. These countries have robust legal and regulatory frameworks and are widely recognized as having a low risk of forced or child labour. In addition, for our hiring and onboarding process we have established robust background check and age verification procedures to ensure our employees meet the minimum age and eligibility requirements. All employees are required to adhere to our governance policies including the Code, and certify their compliance on an annual basis through the Legal Policy Compliance Course.

SUPPLY CHAIN RISK

In 2023, we conducted an initial supply chain risk assessment to identify potential areas of vulnerability for forced labour and child labour. We implemented a process for determining higher risk supplier spend categories through the consideration of various factors, including geographical locations, industry-specific risks, and the nature of the work involved. Using this approach enables Gibson to focus our efforts on the areas of our supply chain with a higher potential to be exposed to modern slavery risks. Based on our initial assessment and given that to the best of our knowledge 100% of our Tier 1 suppliers in 2023 were based in Canada and the U.S., our overall risk was assessed to be low.

Nevertheless, we acknowledge that the procurement of certain goods from our suppliers may involve global suppliers beyond the first tier from regions that face a higher risk of forced labour or child labour. We will work to expand the scope of our supply chain risk assessments in the future to better understand the complex nature of our supply chain.

RISK MANAGEMENT AND DUE DILIGENCE

Through our supply chain management program, we actively manage and mitigate risks throughout our value chain and ensure we work with suppliers who align with our values and uphold high standards of



ethical business conduct. Prior to engaging in any contractual relationships, we integrate due diligence processes into our supplier prequalification and screening mechanisms to assess alignment with our requirements and mitigate potential risks.

We engage certain suppliers working on site in a prequalification process so we can understand their experience, certifications, health and safety processes, financial health and other criteria, and ensure they meet minimum requirements. We collect this information prior to awarding contracts, and on an annual basis thereafter, from certain suppliers through a prequalification questionnaire from our third-party supplier management tool, ISNetworld. The prequalification process also includes a mandatory sustainability questionnaire that asks questions related to supplier's sustainability practices and performance, which includes specific questions on human rights and modern slavery topics. Registering with ISNetworld is only a requirement for all suppliers working on site across all facilities where we operate in Canada and the U.S., and not applicable to all suppliers. Therefore, in 2023 approximately 33% of all suppliers we worked with completed the sustainability questionnaire in ISNetworld.

We also continue to ensure that human rights considerations are incorporated into our RFPs process by requiring all proponents to complete a sustainability questionnaire. The questionnaire holds a minimum of 10% weighting of the overall supplier selection criteria for evaluating all RFPs, which ensures our suppliers are not only qualified for the work, but aligned with our commitment to sustainable practices. This engagement is relevant to all RFPs we issue for goods or services we procure for our operations in Canada and the U.S.

Our contracts with suppliers mandate compliance with all applicable laws and regulations. In addition, such contracts require suppliers to provide contractual representations that they shall comply with Gibson's policies, including the Code and the Supplier Code.

Remediation Measures

In 2023, Gibson did not have any identified or reported instances of forced labour, child labour, or loss of income to vulnerable families, and there were no other complaints or concerns raised by any party with respect to the Company's human rights practices. As a result, we did not undertake any remediation measures. However, if an incident of forced or child labour were to be reported, Gibson is committed to working with our suppliers to investigate the incident and respond appropriately to remediate the impact in accordance with our policies and processes.

Assessing Effectiveness

Gibson acknowledges our responsibility to continue assessing the effectiveness of what we are doing to identify and mitigate the risks of modern slavery in our operations and supply chain. We regularly review the effectiveness of our actions by:

- Reporting to the Sustainability and ESG Committee of the Board on modern slavery matters
- Conducting training and engagement activities with employees, suppliers and other stakeholders
- Performing ongoing risk assessments and monitoring of high-risk supply chain categories and geographies
- Collecting information and incorporating sustainability and human rights considerations into the supplier prequalification and screening process
- Investigating all reports received through our established grievance mechanisms and ensuring complaints are properly resolved



- Tracking key performance indicators and undergoing periodic reviews of our approach to ensure continued alignment with evolving international standards and best practices

Looking forward, we endeavor to continuously enhance our understanding of potential modern slavery risks in our operations and supply chain. To support risk assessment and ongoing monitoring, we plan to implement a third-party market intelligence platform that provides data and information on modern slavery and other supply chain risks for our suppliers. We also will continue to engage our employees and suppliers on modern slavery topics, and regularly review our governance policies and management systems.

Approval

As required pursuant to subparagraph 11(4)(b)(ii) of the Act, this report was approved on behalf of the Reporting Entities by the Board of Gibson Energy Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. 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 2023.

Steve Spaulding

President & Chief Executive Officer and Director
Gibson Energy Inc.

May 30, 2024

I have the authority to bind Gibson Energy Inc. and the Reporting Entities.

