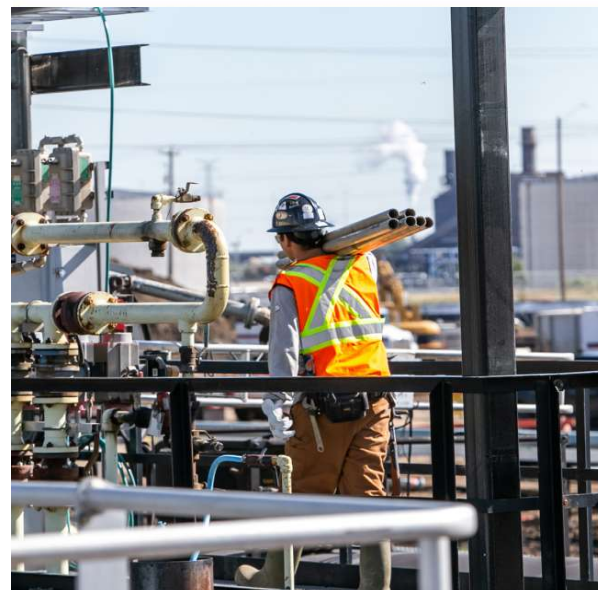
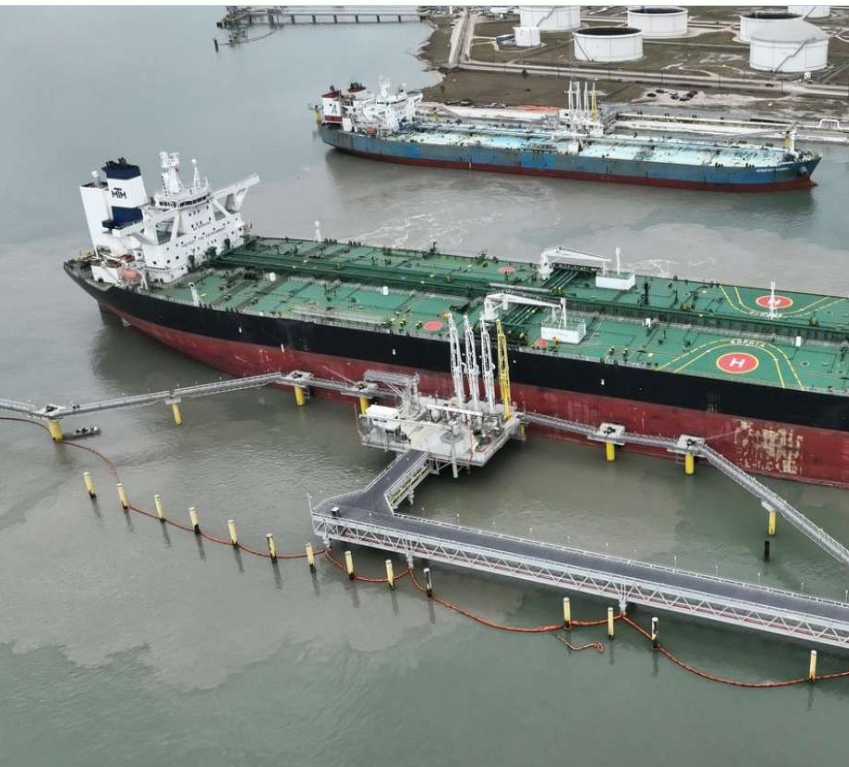




2024 MODERN SLAVERY REPORT

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

MAY 2025





Introduction

This Modern Slavery Report (the "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, 2024, to December 31, 2024. This 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.

For this Report, we use the term "Suppliers" to refer to an organization or individual who provides goods, and/or services to Gibson. This includes our contractors, suppliers, subcontractors, vendors, service providers, and external consultants. We use the term "Tier 1 Suppliers" to refer to direct Suppliers of final goods or services provided to Gibson.

This is Gibson's second annual Report in accordance with the Act which provides 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. Based on our third-party, company-led risk assessment, no incidents or complaints related to modern slavery or forced labor were identified across our operations or Tier 1 Suppliers in 2024.

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, the Company's operations are located across North America, with core terminal assets in Hardisty and Edmonton, Alberta, Ingleside and Wink, Texas, and a facility in Moose Jaw, Saskatchewan. 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.

At Gibson, we believe our competitive advantage lies in the strengths and talents of our dedicated employees. Our permanent workforce currently includes approximately 437 full-time employees and 4 part-time employees across Canada and 53 full-time employees in the U.S. To learn more, please visit www.gibsonenergy.com.

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".





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 liquids infrastructure assets that include terminals, rail loading and unloading facilities, gathering pipelines and a crude oil processing facility. The primary facilities within this segment include the Hardisty and Edmonton Terminals, which are the principal hubs for aggregating and exporting crude oil and refined products out of the WCSB; the Gateway Terminal, a liquids export terminal connecting the Permian and Eagle Ford basins to global markets, located in Ingleside, Texas; the DRU which is located adjacent to the Hardisty Terminal; the Moose Jaw Facility, a crude oil processing facility located in Moose Jaw, Saskatchewan; the Wink Terminal, a crude oil aggregating hub, located in Wink, Texas; and gathering pipelines in Canada and the U.S.
- 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 helping to drive volumes through the Company's key infrastructure assets, primarily in the province of Alberta and the state of Texas. The Marketing segment also engages in optimization opportunities which are typically location, quality and/or time-based. The hydrocarbon products include crude oil, natural gas liquids, road asphalt, roofing flux, light, heavy straight run distillates and gas oils. The Marketing segment sources its hydrocarbon product from North American sources, the majority from Western Canada as well as the Permian basin and markets those products throughout Canada and the U.S.

Gibson also imported goods into Canada in 2024 as part of our ongoing operations.

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



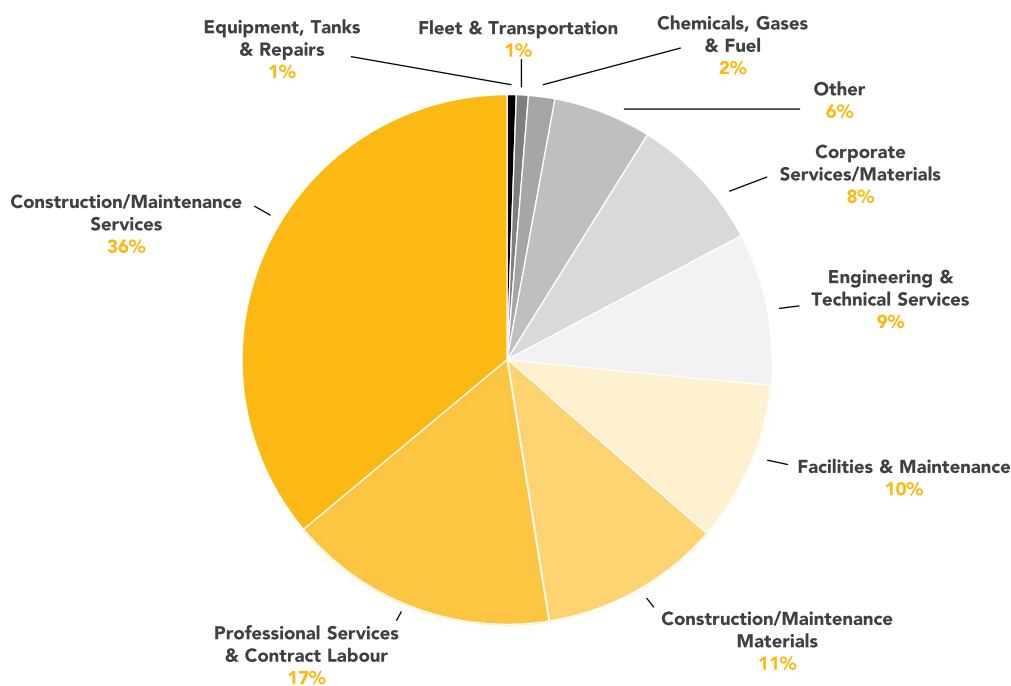


SUPPLY CHAIN

Gibson's Suppliers 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 own and operate.

Since our operations are based exclusively in Canada and the U.S., the majority of our supply chain spend is concentrated within these countries. In 2024, Gibson's vendor base totaled 1,130 Tier 1 Suppliers, of which approximately 72% were located in Canada; 28% in the U.S.; and 1% from other countries. Gibson's supply chain spend for the reporting year is broken down across the categories of spend as shown in the following figure.

Gibson Energy's 2024 Supply Chain Spend by Category



Steps Taken to Prevent and Reduce Risks of Modern Slavery

During the reporting year, Gibson maintained efforts 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:

- i. Developed and delivered 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
- ii. Assessed Suppliers on sustainability and human rights topics through our Supplier prequalification and request for proposals (RFP) due diligence processes
- iii. Implemented a third-party Supplier risk screening platform to assess and evaluate potential risks associated with our highest spend Tier 1 Suppliers



- The third-party platform conducts reputational screenings relating to Supplier compliance and ethical risks, including human rights (such as modern slavery), financial stability, environmental impact, legal and regulatory issues (including sanctions, fines, and trade restrictions), bribery and corruption, and geopolitical instability. The tool assigns risk scores for all suppliers.

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 by Gibson's Board of Directors (the "Board") and are reviewed by the Board to ensure continued alignment with laws, standards and best practices. In 2024, no known 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. The Policy was approved by the Board in July 2021. 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

During the reporting period, Gibson delivered mandatory, in-depth training on human rights and modern slavery to key personnel responsible for supply chain and procurement, as well as those working closely with Suppliers. In March 2024, we launched our internally developed Supply Chain Human Rights Training, which was mandatory for all employees in our Supply Chain Management (SCM), Sustainability, and Legal teams. The training was also made available as an optional course to all other Gibson personnel.

A total of 58 employees completed the training in March 2024. This included 100% of employees in the SCM, Sustainability, and Legal teams, and over 11% of Gibson’s total workforce at the time. The training was delivered in a hybrid format, with an in-person session hosted at our Calgary head office and virtual sessions offered for employees in other regions. It is also assigned to new employees and contractors in SCM, Legal, and Sustainability as part of their onboarding through Gibson’s Learning Management System (LMS). Topics covered in the training include: the definitions and significance of modern slavery, forced labour, and child labour; an overview of the Act and its implications for Canadian businesses; Gibson’s modern slavery risk assessment and due diligence processes; and the responsibilities of Gibson employees in identifying and managing modern slavery risks.



As of December 31, 2024, 100% of employees in Legal, Sustainability, Indigenous Relations, and SCM had completed the online training. We will continue to review and update this training regularly to ensure alignment with legislative developments.

In 2024, Gibson also delivered its annual Legal Policy Compliance Course. This course requires all full-time and part-time employees, as well as contract workers, to review and certify their understanding of and compliance with key company policies—such as the Code of Conduct and Whistleblower Policy—upon hire and on an annual basis thereafter, via the LMS.

We achieved 99% completion of this course across the organization in 2024. The objective of the course is to ensure ongoing awareness of Gibson's policies and ethical standards, and to provide employees with the knowledge and tools needed to navigate compliance risks and uphold responsible business practices.

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 raise their awareness on sustainability topics and conduct formal stewardship meetings with several Suppliers on an annual basis.

In April 2024, we held our third annual 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 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 Suppliers to support capacity building.

Risk Assessment and Management

OPERATIONS RISK

Based on our internal governance processes, we consider the risk of modern slavery within our operations to be very low. As we operate exclusively in Canada and the United States and comply with all applicable laws and regulations, our operations are situated in jurisdictions with strong legal and regulatory frameworks that are widely recognized as low risk for forced and 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

Building on the initial supply chain risk assessment conducted in 2023, we enhanced our process in 2024 by using a third-party Supplier screening tool to screen 193 of our highest-spend Tier 1 Suppliers²

²Suppliers added to the screening platform were prioritized based on highest spend and whether they were identified as potentially high risk using three social assessment parameters: (1) whether products or services would be sourced from countries with known reliance on migrant labour, forced or child labour, or significant language and cultural barriers; (2) whether operations would take place in areas affected by poverty, drought, severe health challenges, or natural disasters; and (3) whether operations would occur in proximity to Indigenous Peoples. In the absence of detailed information, suppliers were assigned a default "higher risk" rating until further information could be obtained.



Our screening process found that, to the best of our knowledge, none of the Suppliers screened were involved in modern slavery or forced labour. Additionally, the screening process suggested that the Suppliers from outside Canada and the U.S. did not have heightened supply chain risks. However, we recognize that some goods procured through our Suppliers may originate from beyond Tier 1, including from regions with elevated risks of forced or child labour. We remain committed to deepening our understanding of our supply chain and will continue expanding the scope of our risk assessments where reasonable to better address these complexities.

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 Suppliers who will be on-site for Gibson or one of its subsidiaries and is not applicable to all Suppliers. In 2024, we made the sustainability questionnaire mandatory for all on-site contractors in ISNetworld. As of April 2025, approximately 97% of the on-site contractors we work with through ISNetworld have completed the questionnaire.

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 2024, 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:

- Performing ongoing risk assessments and monitoring of supply chain categories and geographies using a Supplier screening process
- Collecting information and incorporating sustainability and human rights considerations into the Supplier prequalification and screening process
- Conducting training and engagement activities with employees, Suppliers, and other stakeholders
- Investigating all reports received through our established grievance mechanisms and ensuring complaints are properly resolved
- Tracking and undergoing periodic reviews of our approach to ensure continued alignment with evolving international standards and best practices
- Reporting to the Sustainability and ESG Committee of the Board on modern slavery matters

Looking ahead, we are committed to continuing strengthening our understanding of potential modern slavery risks across our operations and supply chain. To support risk assessment and ongoing monitoring, we will continue leveraging our third-party risk screening tool to identify potential risks. Additionally, we remain focused on engaging employees and Suppliers on modern slavery topics while regularly reviewing and enhancing 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 for and on behalf of the Board of Gibson Energy Inc. and not in my personal capacity that the Board has reviewed the information contained in the Report for the Reporting Entities listed above and that the information in this Report is true, accurate and complete in all material respects for the purpose of the Act, for the 2024 reporting year.

Curtis Philippon

President & Chief Executive Officer and Director
Gibson Energy Inc.

May 30, 2025

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

