

Sustainability and Responsible Sourcing Policy

We are committed to responsible and sustainable sourcing practices that fulfill the needs of today while preserving the resources necessary for future generations. We uphold a strong ethic of land stewardship in our timber procurement, supporting practices that ensure reforestation, sustainable forest management, and the careful cultivation and harvest of trees. Our approach prioritizes the conservation of soil, air, and water quality, the protection of biodiversity and wildlife habitats—both terrestrial and aquatic—and the preservation of recreational and aesthetic values within forested landscapes.

Guided by an unwavering dedication to sustainability, we ensure that our products are sourced from responsibly managed forests and actively promote the advancement of sustainable forestry practices across our organization and value chain.

We are committed to strengthening the traceability of our fiber sources and ensuring our complete disengagement from the following unacceptable activities:

- Illegal harvesting or illegal trade in forest products
- Violation of customary or human rights within the forestry or forest products sector
- Violation of workers' rights and principles defined in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work within the forestry or forest products sector
- Destruction of High Conservation Values (HCVs) in forests or High Conservation Value areas
- Conversion of natural forest cover
- Use of genetically modified organisms in forestry operations for any other purposes than research.

We expect all employees and business partners to actively support and promote these principles.

We steadfastly uphold full compliance with social legislation, including but not limited to civil rights, equal employment opportunity, gender equity, diversity and inclusion, anti-discrimination and antiharassment policies, workers' compensation, and occupational health and safety.

We also uphold the rights of Indigenous Peoples, support the right of workers and communities to access information, recognize prevailing wage standards, and affirm the freedom of association and the right to organize.

Our approach is guided by both the letter and spirit of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998).

In alignment with our principles of sustainability and responsible sourcing, we will not knowingly procure or utilize forest-based materials from the following sources:

- **Non-compliant Forestry Operations:** Fiber harvested in significant violation of state recognized Best Management Practices (BMPs) for Forestry.
- **Threatened High Conservation Values:** Forests where High Conservation Values (HCVs) and critical ecosystems are at risk due to unsustainable or irresponsible forest management practices.
- **Converted Forest Lands:** Forest areas that have been knowingly converted to non-forest uses, including agriculture, infrastructure, or other developments.
- **Degraded Natural Forests:** Any materials derived from the conversion of primary forests to other vegetation types, including the establishment of forest plantations in place of native forest ecosystems.

We reserve the right to suspend or terminate our relationship with any partner whose actions are found to be in violation of this policy. Upholding these standards is a non-negotiable condition of our business relationships, and we are prepared to take decisive action to ensure alignment with our values and commitments.

This policy applies across Northflare Energy operations in North America including the following companies:

- Northflare Energy Bio Operating, LLC
- Northflare Energy Quitman, LLC
- Northflare Energy Crossville, LLC
- Northflare Energy Jackson, LLC
- Northflare Energy Brookhaven, LLC

For Northflare Energy Management:



Simon Plagborg, Chief Executive Officer

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