



**CORPORATE SOCIAL RESPONSIBILITY
POLICY**

CAPSTONE INFRASTRUCTURE CORPORATION
Updated August 2025

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A Message from Capstone's Management

Ensuring the integrity of Capstone Infrastructure Corporation's (the "Company") activities is a basic foundation principle that is encouraged and supported by the Company's board of directors (the "Board of Directors") and the Company's senior management.

The Company is committed to acting ethically and responsibly in all areas of its operations. The trust of the public is paramount to the success of our business. Every employee has the responsibility to demonstrate this social responsibility.

This Corporate Social Responsibility ("CSR") policy ("Policy") provides clarity and direction for our employees and the staff of the Company and all subsidiary operations within the Capstone Infrastructure Corporation family.

CSR is a strategic imperative and mindset focused on ensuring the Company takes responsibility for the impact of its actions and business operations on the environment, customers, employees, communities, and other stakeholders.

For our Company, we define corporate social responsibility as:

- Conducting business in a socially responsible and ethical manner, in accordance with the Code of Business Conduct and Ethics ("Code of Ethics");
- Protecting the environment and safety of people through adherence to the Health, Safety and Environment ("HSE") policy; and
- Engaging, respecting and contributing to the communities in which we operate.

These responsibilities must be incorporated into all business decision-making and day-to-day activities.

Policy Statement

Scope

The term “Company” herein shall refer to Capstone Infrastructure Corporation and the term “Capstone Infrastructure Group” means, collectively, the Company and each subsidiary entity of the Company (a “Subsidiary”). The term “Management” herein shall refer to senior management of the Company and all Subsidiaries. The term “Plant Managers” herein refers to business unit leads, general managers, site managers, and managers or directors of operations, as applicable, at the asset level.

This purpose of this Policy is to provide guidance to all Capstone Infrastructure Group employees so that they are equipped to:

- Identify and manage Capstone Infrastructure Group’s corporate social responsibilities;
- Make appropriate disclosures regarding such responsibilities to their managers and to Capstone Infrastructure Group’s key stakeholders, where appropriate; and
- Understand the expectations of the Company and how it relates to stakeholders.

It is the Company’s commitment to meet and exceed required regulatory or governance standards under which its various businesses operate, and to regularly confirm compliance with those standards.

This Policy formalizes procedures already in place and clarifies responsibilities associated with CSR management. The health and safety of employees and Capstone’s environmental commitments are covered in the Company’s Health, Safety and Environment policy.

Principles

The following CSR principles (the “Principles”) form part of the personal and business objectives and decision-making processes of the Company’s management and employees. The Principles guiding our CSR efforts and approach include requirements to:

- **Act with integrity in meeting corporate governance, legal, and other standards of behaviour.** The Company will operate with integrity and cultural sensitivity in employing clear standards of corporate governance, respecting the rule of law and striving to achieve the most ethical standards of international corporate behavior.
- **Respect human rights and dignity.** The Company will actively promote equal opportunity, equality, and diversity irrespective of race, ethnic or national origins, gender, sexuality, disability, marital status, and religious belief. As the Company grows and interacts with an increasingly diverse supply chain, it remains committed to respecting human rights and will not tolerate child or forced labour at any of our facilities, places of business, or used in goods or products supplied to its business.
- **Be accountable for actions and transparent in reporting.** The Company will earn the trust of its stakeholders by being accountable for its business decisions and transparent in the communication of its business and CSR activities. Subject to privacy and other

obligations, the Company will be prepared to publicly disclose its performance and experiences in the management of CSR as required.

- **Engage with stakeholders to strive for mutually beneficial outcomes.** The Company will assess the direct and indirect impact of its operations and continuously work to improve the manner in which those impacts are managed. This imperative includes engaging and building relationships with stakeholders by providing them with opportunities to express their interests and concerns.
- **Invest in the Company's employees.** The Company will ensure that employees are equipped with the necessary skills to perform their jobs and will promote a safe working environment that supports health and wellbeing.

Roles & Responsibilities

The **CEO** will have primary responsibility for ensuring compliance with this Policy, including:

- Overseeing and approving disclosure of CSR related information to investors and key stakeholders in accordance with the Company's External Communications and Disclosure Policy;
- Determining course of action when significant CSR issues are identified;
- Responding to significant incidents relating to CSR responsibilities;
- Determining the extent and nature of the Company's Board of Directors reporting on and CSR responsibility-related matters; and
- Overseeing the acquisition due diligence process.

Management and Plant Managers have responsibility for carrying out the ongoing asset oversight tasks required under this Policy, including:

- Ensuring that all employees are aware of the need to provide timely reporting on environmental issues as they arise, in accordance with the Health Safety and Environment Policy, each asset's emergency response plan (each, an "Emergency Response Plan") and Crisis Communications Manual;
- Being familiar with the Company's Crisis Communications Manual, in the event that an issue arises;
- Being familiar with the Supplier Code of Conduct;
- Identifying CSR risks and opportunities and escalating them, if appropriate, to relevant Capstone Infrastructure Group staff, including the CEO, General Counsel, Chief Operating Officer, Communications Manager, and Health, Safety and Environment Managers;
- Ensuring that the CEO is informed of all significant matters relating to this Policy and its implementation; and
- Ensuring that the CEO is informed, as appropriate, of significant CSR issues arising at any of the Company's assets.

Plant Managers are also responsible for:

- Developing, implementing and monitoring progress of local HSE plans, as set forth in the HSE policy;
- Being familiar with an asset's Emergency Response Plan, in the event that an issue arises;
- Educating staff on their CSR responsibilities;
- Assisting in the consideration of any risks and liabilities identified; and

- Identifying potential CSR management issues for their respective Company businesses.

Management is also responsible for:

- Updating this Policy in response to changes in internal structure, legislative, regulatory, market and technological developments;

The **Communications Manager** is responsible for preparing, facilitating, and coordinating communications relating to CSR responsibilities with the Company's investors and other stakeholders. The Communications Manager is responsible for advising on and coordinating the Company's approach to:

- Managing reputation risk arising from significant issues if and when they occur, while ensuring compliance with the Company's External Communications and Disclosure Policy, the Crisis Communications Manual and continuous disclosure requirements; and
- Managing the public response to any CSR event.

Reporting on Issues

As part of their ongoing asset management obligations, the Plant Managers of the Company will:

Ongoing

- As per the Crisis Communications Manual, alert the CEO and Communications Manager of any significant CSR management issues arising at any business and determine actions to manage such issues (including notification to stakeholders/regulators); and
- Keep the Communications Manager informed of significant or noteworthy CSR initiatives at the businesses.

Quarterly

- As part of quarterly compliance reporting, provide an update to the Communications Manager and General Counsel on any issues that threaten the business' compliance with environmental commitments.

Asset Management

Investment and Acquisition Due Diligence

Where such information is available, CSR responsibilities are reviewed as part of the investment and acquisition due diligence processes. Where they exist, regulatory obligations are viewed as minimum standards for CSR management post-acquisition.

Environmental responsibility – A critical step in the due diligence process for acquiring a new investment for the Company is the assessment of associated environmental risks and liabilities. Some considerations (if applicable) during the due diligence phase include, but are not limited to, the following:

- Key environmental risks or potential liabilities
- Recent regulatory actions taken or claims
- Ongoing environmental obligations or actions post-acquisition
- Potential environmental remediation costs
- Environmental frameworks or management systems in place

Other social responsibility – Social responsibilities are considered as part of acquisition due diligence. Some considerations (if applicable) during the due diligence phase include, but are not limited to, the following:

- Key social risks or potential liabilities
- Recent regulatory actions taken or claims (with special consideration given to those in relation to human rights, corruption and bribery)
- Ongoing social responsibility obligations or actions post-acquisition
- Potential related remediation costs

Responding to Surveys and Other Requests for Information

As the investment community focuses increasingly on CSR, the Company may receive an increasing number of requests for information and surveys to be completed. All CSR-related questions and surveys will be answered only by the CEO or the Communications Manager in consultation with other officers of the Company, as appropriate.

Incident Response Plan

In the event of a CSR management incident (e.g. environmental disaster, dispute with community, adverse media report, adverse government findings, etc.), each asset will follow its Emergency Response Plan. The Company's External Communications and Disclosure Policy and Crisis Communications Manual must be followed in all instances.