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Keel
Infrastructure

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

2025 Report

Joint report for Keel Infrastructure Corp. and each of its subsidiaries pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Dated: May 26, 2026

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Keel Infrastructure

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INTRODUCTION

This report (the "**Report**") constitutes the 2025 joint report prepared by Keel Infrastructure Corp. (formerly Bitfarms Ltd.) and each of its subsidiaries which also meet the reporting criteria, each of which is directly or indirectly owned by Keel Infrastructure Corp. (altogether "**Keel**", the "**Corporation**" or "**we**"), pursuant to the Fighting Against Forced Labour and Child Labour Act (the "**Act**") in place in Canada.

The Report covers the reporting period from January 1, 2025, to December 31, 2025 (the "**Reporting Period**").

Following the Reporting Period, on April 1, 2026, Bitfarms Ltd. completed a statutory plan of arrangement pursuant to which it redomiciled from Canada to the United States. Upon completion, the ultimate parent company became Keel Infrastructure Corp., a new corporation formed under the laws of the State of Delaware, with Bitfarms Ltd. continuing as an indirect wholly owned subsidiary. This Report reflects the business operations and supply chains during the Reporting Period, when the organization operated under the Bitfarms Ltd. name, and is issued under the successor entity, Keel Infrastructure Corp.

Keel is committed to continue conducting business in a manner that respects internationally recognized human rights and to preventing and mitigating the risks of forced labour and child labour in its operations and supply chains.

GOVERNANCE

Ethical governance and responsible decision-making are embedded within Keel's corporate culture through its Code of Business Conduct and Ethics and board-level oversight. During the Reporting Period, our Board of Directors maintained responsibility for overseeing environmental, social, and human rights matters, including forced labour and child labour risks, consistent with prior years. Following the Reporting Period, in March 2026, the ESR Committee was reconstituted as the Governance, Nomination, Safety, Sustainability and Technical Committee ("**GNSST Committee**").

OUR BUSINESS, ACTIVITIES & SUPPLY CHAINS

During the Reporting Period, Keel operated as a North American digital and energy infrastructure company with a growth focus on high-performance computing ("**HPC**") and artificial intelligence ("**AI**") infrastructure, while maintaining legacy Bitcoin-mining operations. The Company owned and operated energy-secured data centers across the United States and Canada, and continued development of large-scale infrastructure projects in North America. During the Reporting Period, the Company discontinued its operations in Argentina and classified its operations in Paraguay as discontinued operations and assets held for sale.

Through its subsidiaries, the Corporation owns and operates data centers, comprised of computers (referred to as "**Miners**") designed for the purpose of validating transactions on the Bitcoin ("**BTC**") Blockchain (referred to as "**Mining**"). Keel generally operates Miners 24 hours a day producing

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computational power (measured by hashrate) which it sells to Mining Pools on reputable cryptocurrency trading platforms.

As of December 31, 2025, Keel operated 12 data centers with additional sites under development in two countries (Canada and the United States) using a diversified energy mix including renewable hydroelectric, waste-to-energy, and other sources under long-term power contracts.

Supply Chains

Keel's supply chains consist primarily of data center and electrical infrastructure equipment, specialised computing hardware, contractors, consultants, professional services, and logistics providers.

Our suppliers include global and local vendors. Keel contracts with local enterprises for the construction, installation and in some cases maintenance services of its data centers or specific equipment in the countries where it operates. Our suppliers play a key role in our ability to maintain our business and attain our environmental, social and governance ("**ESG**") commitments, among which is Keel's commitment to reducing the risk of forced and child labour existing anywhere in its supply chains.

Corporate Structure

The table below shows the structure of Bitfarms Ltd. and its subsidiaries as of December 31, 2025, the location in which they operate, and the place of incorporation:

Country	Legal Form	Operations	Ownership	Jurisdiction of incorporation
Canada				
Bitfarms Ltd.	Corporation	Public holding company	Publicly traded under BITF on Nasdaq and TSX	Ontario
2872246 Ontario Inc.	Corporation	Holding company	Bitfarms Ltd. - 100%	Ontario
Bitfarms Paraguay General Partner Inc.	Corporation	General partner	Backbone Hosting Solutions Inc. - 100%	Ontario
Backbone Hosting Solutions Inc.	Corporation	Operating company, with operating subsidiaries	Bitfarms Ltd.- 65.3%; Bitfarms Ltd. (Israel) - 34.7%	Canada (Federal)
Orion Constellation Technologies Inc.	Corporation	Operating company	Backbone Hosting Solutions Inc. - 100%	Quebec
9159-9290 Québec Inc. dba Volta Électrique	Corporation	Electrical contractor	Backbone Hosting Solutions Inc. - 100%	Quebec
BMS Capital Inc.	Corporation	Holding Company	2872246 Ontario Inc. 100%	Ontario
United States				
Backbone Mining Solutions LLC	Corporation	Operating company	2872246 Ontario Ltd. - 100%	Delaware

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Country	Legal Form	Operations	Ownership	Jurisdiction of incorporation
Backbone Hosting Solutions USA Inc.	Corporation	Employment company - US based executives	Backbone Hosting Solutions Inc. - 100%	Delaware
STRONGHOLD DIGITAL MINING INC	Corporation	Holding Company	Backbone Mining Solutions LLC – 100%	Delaware
Backbone Sharon LLC	Corporation	Operating company	Backbone Mining Solutions LLC – 100%	Delaware
Panther Creek Power Operating LLC	Corporation	Power Company	Liberty Bell Funding LLC.	Delaware
Scrubgrass Reclamation Company LP	Partnership	Power Company	Scrubgrass Power LLC - 50% EIF Scrubgrass LLC- 50%	Delaware
Stronghold Digital Mining Hashco LLC	Corporation	Mining company	Stronghold Digital Mining Operating LLC	Delaware
Stronghold Digital Mining LLC	Corporation	Mining Company	Stronghold Digital Mining Inc.	Delaware
Carbon Node East Holdings, LLC	Corporation	Holding Company	Carbon Node LLC	Delaware
Carbon Node East Development, LLC	Corporation	Development Company	Carbon Node Holdings LLC	Delaware
Carbon Node East Property, LLC	Corporation	Property owner	Carbon Node Holdings LLC	Delaware
Grant Node Development, LLC	Corporation	Development Company	Grant Node Holdings LLC	Delaware
Grant Node Property, LLC	Corporation	Property owner	Grant Node Holdings LLC	Delaware
Mercer Node Development, LLC	Corporation	Development Company	Mercer Node Holdings LLC	Delaware
Mercer Node Property, LLC	Corporation	Property owner	Mercer Node Holdings LLC	Delaware
Sharon HPC Energy Inc.	Corporation	Power company	Mercer Node Development, LLC	Delaware
Argentina				
Backbone Hosting Solutions SAU	Corporation	Operating company	Backbone Hosting Solutions Inc. - 100%	Argentina
Paraguay				
Bitfarms Paraguay Limited Partnership	Partnership	Operating company	GP - Bitfarms Paraguay General Partner Inc. - 100 units LP - Backbone Hosting Solutions Inc. - 1 unit	Ontario & Paraguay
Backbone Hosting Solutions Paraguay SA	Corporation	Operating company	Backbone Hosting Solutions Inc. - 90%; Bitfarms Ltd. - 10%	Paraguay
D&N Ingeniería SA	Corporation	Operating company	Backbone Hosting Solutions Inc. - 93%; Bitfarms Ltd. - 7%	Paraguay

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Country	Legal Form	Operations	Ownership	Jurisdiction of incorporation
Israel				
Bitfarms Ltd. (Israel)	Corporation	Dormant	Bitfarms Ltd. - 100%	Israel

Canadian Reporting Entities (Business Numbers)

For the Reporting Period, the Corporation identified the following Canadian entities for purposes of reporting and/or filing under the Act:

- Bitfarms Ltd. 72997 9518
- Backbone Hosting Solutions Inc. 70984 5499
- 2872246 Ontario Inc. 77322 7509
- Orion Constellation Technologies Inc. 75115 2604
- 9159-9290 Quebec Inc. (Volta) 82434 5078
- Bitfarms Paraguay General Partner Inc. 70359 8706
- Bitfarms Paraguay Limited Partnership 70247 7803
- BMS Capital Inc. 72573 4560

Enterprise Risk Management (ERM), Culture and Philosophy

Keel is committed to robust risk governance under its ERM framework to ensure that the executive team strategically oversees and manages risks across all dimensions of operations. The framework is designed to ensure that risks are identified, assessed, mitigated, and monitored in a manner that is relevant, timely and supports our strategic objectives and corporate governance principles.

We maintain a low tolerance for non-compliance with labour and human rights standards and prioritize engagement with reputable suppliers that align with our compliance expectations.

Risk-Aware Culture – We foster a culture that understands and respects the importance of risk management in achieving business success. Employees at all levels are encouraged to participate actively in risk identification and mitigation processes.

Being vendor reliant, Keel accepts a low to moderate levels of risk related to supply chain vulnerabilities, particularly our reliance on a limited number of hardware suppliers. Our risk appetite reflects the necessity of maintaining supply chain integrity while actively seeking alternatives to mitigate single points of failure.

While we recognize the challenges associated with vendor concentration, especially for critical hardware, we maintain a low tolerance for non-compliance in our supply chain. We prioritize strong relationships with reputable vendors and are working towards a standard where all material procurement activities adhere to our strict compliance standards.

Cultural and Operational Practices – We are mindful of the risks that come from cultural diversity and local business customs that could affect our operations. We adopt a cautious approach to make sure that our labour, health, and safety practices comply with both local rules and our corporate

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values. We establish global policies to uphold international/high standards, while local standards are the lowest level we can accept.

STEPS TAKEN TO PREVENT AND REDUCE RISK

In general terms, Keel has taken the following actions during the Reporting Period in order to reduce the risk that forced labour or child labour is used at any step of our supply chains, as well as other objectives:

- In 2025, Keel maintained an Environmental and Social Responsibility Committee ("**ESR Committee**") at the board level of the Corporation, the responsibilities of which include overseeing Keel's programs and practices relating to environmental, health and safety, sustainability and corporate social responsibility (collectively the "**ESR Matters**"). The ESR Committee met at such times and places as the Chair may determine, but in any event not less than two times per year. The ESR Committee reviews and makes recommendations regarding Keel's environmental and social programs and practices which impact its stockholders, employees, local communities, partners and other key stakeholders and which impact its ability to effectively achieve its business goals. Following the Reporting Period, in March 2026, the ESR Committee was reconstituted as the Governance, Nomination, Safety, Sustainability and Technical Committee ("**GNSST Committee**").
- Maintained an ESG Steering Committee as a cross-functional management committee of the Corporation, the purpose of which, under the oversight of the Board of Director's GNSST Committee, is to assist the senior leadership team of the Corporation in (i) setting general strategy relating to ESG Matters, including the mitigation of forced and child labour risks; (ii) developing, implementing and monitoring initiatives and policies based on that strategy; (iii) overseeing communications with employees, investors and stakeholders with respect to ESG Matters; (iv) monitoring and assessing development relating to, and improving the Corporation's understanding of ESG Matters; and (v) efficient and timely disclosure of ESG Matters to internal and external stakeholders.
- Maintained a Vendor Know Your Counterparty Process (collectively the "**Vendor KYC Process**") which is detailed further below in this Report.
- Conducted a review of the Corporation's mandates and contractual clauses to include and address to improve risk identification within our supply chain and activities.
- Conducts its worker recruitment policies and procedures to ensure all employees are recruited on a voluntary basis and meet the minimum age-related working eligibility requirements in each jurisdiction where it operates.

Additionally, the Corporation has undertaken to:

- Seek advice from a third-party consultant about international best practices with regards to forced labour and child labour in our supply chains, as applicable.
- Seek to identify in a more granular fashion the areas of higher risks of forced labour and child labour in our supply chains and in our activities and take necessary steps to actively manage that risk, as applicable.

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- Put in place information and offer awareness training to our employees specifically on forced labour and child labour in our supply chains.

POLICIES AND COMMITTEES

As part of Keel's commitment to ethical and responsible business conduct, we strive to comply with the applicable laws and regulations in all the countries where Keel has or had its activities during the Reporting Period, namely Canada, the United States, Argentina and Paraguay, as well as any jurisdictions in which we may operate in the future. Our policies and procedures also aim at setting out broad principles to support the recognition of human rights.

Code of Business Conduct and Ethics

The Code of Business Conduct and Ethics of Keel (the "**Code**") sets out its commitment to conducting its business and affairs with honesty, integrity and in accordance with the highest ethical and legal standards. The Code provides a set of ethical standards to guide each director, officer, employee, consultant and contractor of Keel (collectively, "**Representatives**") in the conduct of their business. For each director, officer and employee, the Code constitutes conditions of employment, and for each consultant and contractor, the Code constitutes conditions of providing services to Keel. This Code provides an overview of Keel's expectations for its Representatives and is supplemented by other current policies adopted by Keel and those other policies that may be adopted by Keel from time to time.

Whistleblower Policy

Keel's Whistleblower Policy is in place to provide its Representatives with a confidential and anonymous process for disclosing complaints or concerns regarding any violations of the law or the Corporation's policies. The procedures under this policy provide Representatives with the opportunity to submit their anonymous complaints freely and anonymously and be protected from any form of retaliation if any potential issues regarding modern slavery in either our operations or with our suppliers may arise.

This policy also describes how and where a complaint or concern can be submitted, who deals with complaints, how complaints are expected to be handled, processed and documented as well as the standards and principles that are expected to govern the processing of all complaints and concerns whether they are received from people within Keel or by third parties.

Anti-Bribery and Anti-Corruption Policy

Our Anti-Bribery and Anti-Corruption Policy sets out Keel's commitment to maintaining the highest standards of integrity and accountability in our business affairs while at the same time seeking to grow our business and enhance shareholder value. Specifically, Keel does not tolerate any kind of association with our Representatives engaging in corrupt activities (including forced labour or child labour), and we require our Representatives to report actual or suspected acts of corruption.

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Anti-Money Laundering Policy

Our Anti-Money Laundering Policy outlines our commitment to maintaining the highest standards of integrity by preventing, detecting, and reporting money laundering activities in compliance with all applicable laws and regulations. Applicable to all Representatives, the Policy establishes guidelines to minimize Keel's risk, mandating effective internal controls, risk assessments, due diligence on business partners and transactions, and the prompt reporting of suspicious activities through designated channels, including a whistleblower platform.

Human Rights and Social Responsibility

As stated in the Code "The Corporation strives to ensure that its business is conducted in all material respects in accordance with all applicable laws, stock exchange rules and securities rules and regulations in all jurisdictions where the Corporation operates. This includes compliance with all applicable anti-bribery, anti-corruption, money laundering, facilitation payment laws, including the *Canadian Corruption of Foreign Public Officials Act* and the *U.S. Foreign Corrupt Practices Act*, as well as anti-trust/competition, privacy, labour, human rights, environmental and securities laws in all material respects."

As part of the annual certification process to confirm compliance with the corporate policies of Keel, including labour and human rights, all directors, officers, employees and, as appropriate, consultants and contractors, may be asked to participate in training sessions to help ensure that they understand the terms of the Code and all corporate policies of Keel.

Keel focuses on creating the best and safest working environment for our employees while also giving back to the people in the communities around our data centers. Through its Sponsorship Policy, Keel aims at promoting employee and community engagement through financial contribution in non-work-related events which are aligned with Keel's values, and as such provide revenue to the communities which can in turn be used for social programs in the communities where Keel operates. The donations may take the form of strategic annual lumpsum or material donations to the community, sponsorship of corporate or sportive events of Keel employees or their dependents.

As an example, Keel has significantly expanded its community engagement in the Panther Valley School District in Nesquehoning, PA through a multi-year partnership designed to remove barriers to learning and strengthen families. Key efforts include funding a full-time Student Success Specialist to support attendance and academic engagement; expanding after-school programs, clubs, and enrichment opportunities; adding an additional daily bus route to improve access to programming; supporting the Panther Valley Community Food Pantry with food, clothing, and essential supplies; and investing in safe, engaging learning environments by doubling the size of the elementary school playground. These initiatives directly benefit Panther Valley Elementary and Intermediate Schools, students and families across the district, and community partners including United Way of the Greater Lehigh Valley, which supports the Community Schools model locally.

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Prevention of Harassment, Discrimination and Violence Policy

Keel recognizes that the consequences of harassment, discrimination and violence are harmful to the physical and psychological state of its employees in and outside of work, and may also affect colleagues, and the workplace more broadly through productivity loss, financial costs, reputational risks, and ultimately impacts society at large, including pressures on the healthcare and judicial systems.

Despite the fact that Keel operates globally and that legislation and practices regarding harassment, discrimination and violence may differ, Keel has adopted a zero-tolerance policy towards any form of harassment, discrimination, or violence in the workplace, regardless of the country in which it operates.

Keel is committed to combat all forms of harassment, discrimination, and violence in the workplace. As such, it is taking all reasonable measures to eliminate such behavior and provide its employees with a safe environment by adopting a comprehensive policy based on prevention, support, and intervention.

Furthermore, Keel expects all its employees, vendors, contractors, and subcontractors to exhibit behaviors in line with its values that promote a safe, healthy and engaging work environment.

Diversity Policy

Keel recognizes the benefits of fostering diversity among our employees, management team and the Board of Directors to enhance organizational strength, problem solving ability and opportunity for innovation.

“Diversity” by definition is any dimension that can be used to differentiate groups and people from one another and includes gender and age, race, nationality, culture, language, sexual orientation, and other ethnic distinctions, education, regional and industry experience and expertise. Inclusion is a collaborative, supportive, and respectful environment that increases the participation and contribution of all employees. Keel is committed to fostering diversity and eliminating discrimination in the workplace, in respect of human rights principles.

DUE DILIGENCE PROCESSES

As a dual listed publicly traded company, the global nature of Keel’s business increases the number of regulations and scrutiny to which it is exposed, as well as the importance of mitigating risk exposure from vendors, partners and third parties.

Vendor KYC Process

The Company applies a risk-based Vendor Know Your Counterparty Process (the “**Vendor KYC Process**”) to assess and mitigate vendor risk. The Vendor KYC Process considers qualitative and quantitative risk factors, including jurisdiction, nature of goods or services, and regulatory exposure. Where appropriate, vendors are required to provide attestations regarding compliance with forced

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labour and child labour laws. The process is intended to minimize strategic, financial, regulatory and reputational risk while doing business or resourcing services and goods from countries that attract high levels of regulatory scrutiny.

ASSESSING AND MANAGING THIRD-PARTY RISK

Keel recognizes that there could be risks of forced and child labour within its supply chains. As an initial step in assessing this risk, Keel has reviewed the U.S. Department of Labor's *List of Goods Produced by Child Labor or Forced Labor* (the "**List**"), which identifies potential increased risk of child and forced labour in the production of electronics. Given that Keel's supply chains include specialized computing hardware and electrical infrastructure equipment, the Corporation considers these categories to present a higher potential exposure to forced and child labour risks, particularly where such goods originate from or are manufactured in jurisdictions identified on the List.

Keel has not identified any instances of forced or child labour in its supply chains during the Reporting Period. Additionally, as described in *Steps Taken to Prevent and Reduce Risk* above, Keel has taken steps to minimize this risk and has committed to undertake further such steps in future. As explained in *Policies and Committees* above, any use of forced or child labour in Keel's supply chains would be in violation of both the law and Keel's internal policies. Accordingly, Keel will continue to monitor all such areas of risk and take immediate remedial action should any cases of forced or child labour be discovered.

REMEDIATION, TRAINING AND EFFECTIVENESS

Remediation Measures and Loss of Income

In 2025, we did not identify any instances of forced labour or child labour and do not currently have a formal policy on how we would remediate any loss related to such activities. Should forced labour or child labour be identified despite our preventive efforts, we will address the situation in alignment with our established commitments, corporate policies and standards including our Code of Business Conduct and Ethics, Whistleblower Policy, and Vendor KYC Process, and will take appropriate steps to remediate any loss of income to affected vulnerable families.

Training and Awareness

Keel deploys an online training platform and continues to provide online courses on various topics as part of its new employees' onboarding program and continuous training for all its employees, including management. Training on the Code of Business Conduct and Ethics, which addresses compliance with labour and human rights laws, is assigned to all employees. The courses available cover a variety of topics dealt with in our policies and procedures, including compliance with laws and regulations, and create awareness of human rights issues, including but not limited to preventing forced labour and child labour in our operations and supply chains.

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Assessing Effectiveness and Next Steps

Keel is committed to addressing the risks of forced labour and child labour within our operations and supply chains. As disclosed in this Report, Keel has implemented and continues to deploy appropriate measures to prevent and minimize these risks. However, since Keel has not identified any incidents of forced labour or child labour being used, no actions have been taken to assess the effectiveness of these measures.

Keel understands and acknowledges the importance of vigilance and will continue monitoring all activities within its operations and supply chain to ensure that modern slavery risks are minimized and mitigated. Keel is committed to reviewing our risk assessment at least annually and putting in place mitigating and/or corrective measures as needed going forward.

FORWARD-LOOKING INFORMATION

This Report may contain forward-looking statements about the Corporation's objectives, plans, goals, aspirations, strategies, performance, prospects, opportunities and legal and regulatory matters that are based on expectations, estimates, projections as at the date of this Report and are covered by safe harbors under Canadian and United States securities law. Any statements that involve discussions with respect to predictions, expectations, beliefs, plans, projections, objectives, assumptions, future events or performance (often but not always using phrases such as "expects", or "does not expect", "is expected", "anticipates" or "does not anticipate", "plans", "budget", "scheduled", "forecasts", "estimates", "prospects", "believes" or "intends" or variations of such words and phrases or stating that certain actions, events or results "may" or "could", "would", "might" or "will" be taken to occur or be achieved) are not statements of historical fact and may be forward-looking information. The Corporation's estimates, beliefs and assumptions are inherently subject to significant business, economic, competitive and other uncertainties and contingencies regarding future events and as such, are subject to change. The Corporation can give no assurance that such estimates, beliefs and assumptions will prove to be correct.

APPROVAL AND ATTESTATION

This Report was prepared by Management, and it has been approved by the Governance, Nomination, Safety, Sustainability and Technical Committee, and the Board of Directors in accordance with the requirements of the Act, and in particular with section 11(4)(b)(ii) thereof, we, the undersigned, attest that we have reviewed the information contained in this joint Report for Keel Infrastructure Corp. and its subsidiaries which also meet the reporting criteria. Based on our knowledge and having exercised reasonable diligence, we attest that the information in this joint Report is true, accurate and complete in all material respects, for the purposes of the Act, for the Reporting Period specified above.

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Keel Infrastructure

I make the above attestation in my capacity as a director of the Board, for and on behalf of the Board, and not in my personal capacity.

I have the authority to bind Keel.

Signed by:
Brian Howlett
6EDA4AA3BC714C8...

Name: Brian Howlett
Title: Chair of the Governance, Nomination, Safety, Sustainability and Technical Committee
Date: May 26, 2026

I make the above attestation in my capacity as a director of the Board, for and on behalf of the Board, and not in my personal capacity.

I have the authority to bind Keel.

Signed by:
Edie Hofmeister
22060E50C1374A5...

Name: Edith Hofmeister
Title: Director and Chair of the Board
Date: May 26, 2026