

Modern Slavery Act - Annual Report 2024

Dated May 1, 2024

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains – YES
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains– YES
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour– YES
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains– YES
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists– YES
- Auditing suppliers– YES
- Monitoring suppliers– YES
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour– YES

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

- Barron Base Oil Corporation has used a contractor to audit overseas supply chain operations to ensure compliance. We have also had all vendors submit disclosure statements confirming that they do not use Child & Forced Labour in their operations.

3. Which of the following accurately describes the entity's structure? (Required)

- Corporation

4. *Which of the following accurately describes the entity’s activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada **yes**
 - outside Canada **no**
- Selling goods
 - in Canada **yes**
 - outside Canada **no**
- Distributing goods
 - in Canada **yes**
 - outside Canada **no**
- Importing into Canada goods produced outside Canada **yes**
- Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada **yes**

5. Please provide additional information on the entity’s structure, activities and supply chains (1,500 character limit).

- **Oilfield Service Company – we distribute and sell products manufactured in Canada and products that we source from outside of Canada. We also manufacture some products at our facilities in Western Canada.**

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- **Yes – code of conduct and vendor reporting / disclosure requirement.**

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- **Embedding responsible business conduct into policies and management systems**

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

- All vendors provide disclosure statements, we also sent a representative to view supplier operations.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports YES
- The locations of its activities, operations or factories YES
- The types of products it sources YES
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers YES
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify

9.*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above **YES**
- Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

- **We have not identified any areas of our supply chain that are currently using forced or child labour**

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains. **YES**

11.1*If yes, which remediation measures has the entity taken? Select all that apply. (Required) N/A

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies
- Other, please specify.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

- **Any new vendors onboarded will be required to file a disclosure with Barron Base Oil Corporation before they can work with us.**

13. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

- No, we have not taken any remediation measures.
- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. - YES

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

- N/A

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- YES

15.1 *If yes, is the training mandatory? (Required)

- Yes, the training is mandatory for employees making contracting or purchasing decisions.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

- Review of the Code of Conduct, and Ensure all vendors file and report compliance disclosure to Barron Base Oil Corporation.

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

- YES

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Setting up a regular review or audit of the organization’s policies and procedures related to forced labour and child labour **YES - annually**
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization’s actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators **YES – Annually**
- Other, please specify.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

- **Annual Vendor Visits and Vendor Disclosure Statements**

A handwritten signature in black ink, appearing to be "Reg Patterson", written over a horizontal line.

Reg Patterson – President
May 1, 2024

Modern Slavery Act Code of Conduct

At Barron Base Oil Corporation we are committed to conducting our business with the highest standards of integrity, ethics, and respect for human rights. We firmly believe in the principles outlined in the Canada Modern Slavery Act Bill S-211 and are dedicated to upholding them in all aspects of our operations. This Code of Conduct serves as a guide for our employees, suppliers, and partners to ensure compliance with the Act and to foster a culture of transparency, accountability, and social responsibility.

We are committed to complying with all applicable laws and regulations, including but not limited to the Canada Modern Slavery Act Bill S-211 and its requirements regarding the prevention of modern slavery and forced labor.

Barron Base Oil Corporation strictly prohibits the use of forced labor, modern slavery, and human trafficking in any form within our operations and supply chains. We will not engage in or tolerate any activities that exploit individuals for labor or personal gain.

We will conduct thorough due diligence on our suppliers and business partners to assess their compliance with our Code of Conduct and the requirements of the Canada Modern Slavery Act Bill S-211. This includes risk assessments, audits, and ongoing monitoring of our supply chain relationships.

We will provide training and education to our employees to raise awareness of the risks and impacts of modern slavery and human trafficking and to ensure they understand their responsibilities in upholding our Code of Conduct.

We encourage our employees, suppliers, and stakeholders to report any concerns or suspected violations of this Code of Conduct through our confidential reporting mechanisms. We are committed to investigating all reports promptly and taking appropriate action to address any violations.

We are dedicated to continuous improvement in our efforts to combat modern slavery and human trafficking. We will regularly review and update our policies, procedures, and practices to ensure they remain effective and aligned with the principles of the Canada Modern Slavery Act Bill S-211.

Barron Base Oil Corporation recognizes our responsibility to respect and uphold the rights and dignity of all individuals. By adhering to the principles outlined in this Code of Conduct and the Canada Modern Slavery Act Bill S-211, we reaffirm our commitment to conducting business ethically, responsibly, and in compliance with the highest standards of integrity.

A handwritten signature in black ink, appearing to be "Reg Patterson", is written over a horizontal line.

Reg Patterson - President – May 1, 2024