



# Forced Labour in Canadian Supply Chains: 2023 Annual Report





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1. What measures did the entity take in the previous financial year to prevent and reduce the risk of forced labour or child labour being used at any stage of the production of goods in Canada or elsewhere, whether by the entity itself or on goods imported into Canada? Select all applicable options.

- **Activity Mapping**
- **Supply Chain Mapping**
- **Conducting an internal assessment of forced labour and/or child labour risks in the organization's activities and supply chains**
- **Hiring an external assessment of forced labour and/or child labour risks in the organization's activities and supply chains**
- **Design and implementation of an action plan to address forced and/or child labour**
- **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**
- Implement practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- **Design and implementation of due diligence policies and processes to identify, address, and prohibit the use of forced labour and/or child labour in the organization's activities and supply chains**
- Conduct a prioritization exercise to focus due diligence efforts on the most serious risks of forced labour and child labour
- Require suppliers to have policies and procedures in place that identify and prohibit the use of forced labour and/or child labour in their activities and supply chains
- **Design and implement child protection policies and procedures**
- **Design and implement contractual clauses against forced labour and/or child labour**
- **Design and implementation of standards, codes of conduct and/or compliance checklists against forced labour and/or child labour**
- Suppliers' audits
- suppliers' monitoring
- **Implementation of measures to cooperate in or provide remediation of forced labour and/or child labour**
- **Design and implement complaints mechanisms**
- **Design and implementation of training and awareness materials on forced labour and/or child labour**
- Design and implementation of procedures to monitor performance in addressing forced labour and/or child labour
- **Collaboration with partners in the supply chain on forced labour and/or child labour matters**
- Collaboration with civil society groups, experts and other interested parties on forced labour and/or child labour matters
- Direct collaboration with workers and families potentially affected by forced labour and/or child labour intended to assess and address risks
- Information not available for the reported period
- Other, please specify:

Throughout this report the Government of Canada has provided lists and requested companies choose which items apply to them. We have indicated which ones apply to by Gran Tierra Energy by highlighting them in blue.

## 2. Please provide additional information describing actions taken (if appropriate).

Gran Tierra Energy (GTE) believes that in order to ensure effective business management, that we must maintain the highest commitment to the respect and promotion of Human Rights. This is within the framework of dignified and non-discriminatory treatment, being inherent in all people, without any distinction, thus, upholding the highest standards to their respect and promotion. It further recognizes its responsibility for the prevention and/or mitigation of the negative consequences that could be caused or contributed to by its operations, allowing access to quick and appropriate remediation in the event of any adverse event resulting from company activities.

Gran Tierra operates with full conviction and commitment to respect internationally recognized Human Rights, applying without limitation, the international standard of the United Nations Guiding Principles on Human Rights and Business and the Guidelines for Responsible Conduct of the OECD. The recognition of human dignity, as well as respect for rights, be it individual or collective, are principles that are observed in all areas of its activities, including its supply chain.

With the aim of respecting Human Rights and avoiding any impacts, the Company has designed its Due Diligence process, which consists of identifying, preventing, managing, reporting, and controlling how to address potential impacts on Human Rights, and guaranteeing that in the event of their materialization, the necessary remediation actions will be taken.

GTE is supported by Shift, the world's leading think tank in the application of Human Rights and business standards, in order to accomplish these objectives. Since 2019, Shift has been constantly and independently supporting GTE in the continuous improvement of its risk application processes and on its standards for Human Rights. For example, Shift helped develop the Company's due diligence process, including by providing an analysis of potential risks for the Company's operations. They have also been conducting periodic independent reviews and evaluations of our internal processes.

Gran Tierra also has procedures in place for its supply chain partners whereby it establishes the commitments required from the companies working with us. This includes their obligations related to Human Rights, to avoid any practice associated with promoting child labour or forced labour, which is prohibited in all of our operations and in those of our partners. These requirements are included within the contracts that our supply chain partners are required to sign in order to work with Gran Tierra Energy. The contracts include human rights clauses and also a document called "*The Responsible Practices for the Respect of Human Rights (RPRHR)*". The RPRHR is a part of the contractual requirements that all contractors must abide by when doing business with GTE. In order to execute our policies and procedures regarding the respect for Human Rights in and through our business operations, the Company has four strategic Pillars for both management and decision-making:

i) Corporate Culture, ii) Due Diligence, iii) Remediation, and iv) Transparency. It is through these four pillars that we implement our strategies both internally and through our Supply Chains.





**3. Which of the following accurately describes the structure of the entity?**

- **CORPORATION**
- Fund
- Association
- Unincorporated organization

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

- Production of goods (including manufacture, extraction, cultivation and processing)
  - in Canada
  - **OUT OF CANADA**
- Selling goods
  - in Canada
  - out of Canada
- Distribution of goods
  - in Canada
  - out of Canada
- Importing goods produced outside of Canada into Canada
- Control an entity engaged in the production, sale or distribution of goods in Canada or outside Canada, or import into Canada goods produced outside Canada

**5. Please provide additional information about the entity’s structure, activities and supply chains.**

Gran Tierra Energy Inc., together with its subsidiaries, is an independent energy company headquartered in Calgary, Canada with international activities in exploration and production of oil and natural gas in Colombia and Ecuador. Gran Tierra leads by example and conducts its operations with integrity, respecting human dignity and individual rights.

Gran Tierra collaborates with local and international contractors and service providers in the regions where it operates. These suppliers are required to comply with corporate policies, including strict rules against child exploitation and forced labour. In the process of acquiring goods and services, supplier management, administration and possession of materials, the Company identifies factors that may affect their execution. The Company bases its decision

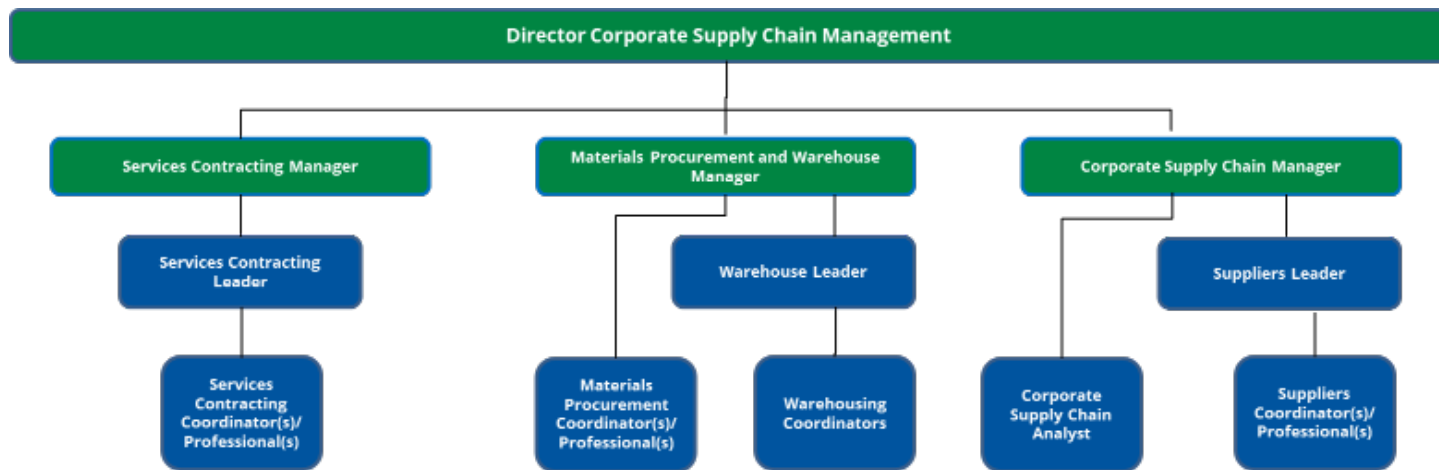
making on policies, controls, and guidelines set out by the parent company, securing compliance with all current standards and regulations of law in the countries where the company operates. In Canada and the United States of America, through the US Foreign Corrupt Practices Act and the US Securities and Exchange Commission, in addition to international policies, procedures, and provisions related to Occupational Health, Safety, Environmental Protection, Code of Ethics and Quality Systems.

All operations related to the procurement of goods and/or services are the responsibility of the Services Contracting Manager and the Materials Procurement Manager; supplier management is the responsibility of the Corporate Supply Chain

Manager, as well as all personnel involved in the supply chain process. These operations and their management are conducted in accordance with the law, Gran Tierra’s internal rules and regulations, and SOX standards.



Gran Tierra Energy's structure for supply chain management is organized in the following way:



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

- YES
- No

6.1 \* If the answer is yes, which of the following elements of the due diligence process has the entity implemented in relation with forced and/or child labour? Select all applicable options.

- **Incorporation of responsible business conduct into management policies and systems**
- **Identification and assessment of adverse impacts on operations, supply chains, and business relationships**
- **Cessation, prevention, or mitigation of adverse impacts**
- **Monitoring of implementation and outcomes**
- Communication on the way of addressing impacts
- **Provision or cooperation in the remediation process where appropriate**

7. Please provide additional information on the entity's policies and due diligence processes related to forced labour and child labour (if applicable).

GTE is committed to fully comply with the due diligence standards enshrined in the United Nations Voluntary Principles on Security and Human Rights and the Guiding Principles on Business and Human Rights and therefore, periodically assesses the risks and impacts on human rights and promotes plans and/or actions to prevent them. The Company also promotes due diligence related to human rights in its supply chain.



Regarding forced labour and child labour, the Company's policies set forth the following:

i. In the [Code of Ethics and Business Conduct](#) and its [Corporate Security Policy](#), it is established that all workers must understand and comply with the national law applicable to their work, which prohibits forced and child labour. Further, it offers the assistance of compliance officers and the legal department to resolve all related concerns.

ii. Pursuant to the [Corporate Human Rights Policy](#), it is committed to eradicating all forms of child labour in the Company's activities, requiring its supply chain to have zero tolerance for these practices in their businesses, and providing its employees and contractors with the necessary tools to address human rights and forced and child labour issues.

iii. Within the [Whistleblower Policy](#), the Company states that it is committed to complying with the laws and regulations of the States in which it operates, and all Company employees are committed to reporting any actual, imminent, or presumed violation.

iv. Through the Responsible Practices for the Respect of Human Rights part of our contractual requirements, it is mandatory that contractors act in accordance with Gran Tierra Energy's corporate human rights policy which states that they are not to participate in, encourage, or benefit from forced labour or child labour, nor to enter into contracts

whose execution conflicts with the contents of the policy, applicable national and international laws, and standards recognized in international human rights law.

v. The Company's Supply Chain Procedure establishes the guidelines and framework for managing the planning, execution, procurement of goods and/or services, custody of materials, supplier management and administration of the Company's supply chain. Furthermore, it requires compliance with Corporate Policies through the supply chain process, including specifically GTE's Human Rights Policy and requires contractors and suppliers "to display the same level of commitment" that the company applies internally.

Throughout the procurement process, Gran Tierra clearly states its zero-tolerance policy for any form of child or forced labour. The entire "Supplier Validation" due diligence process requires review of legal documentation, added to recognition and acceptance of GTE's policy (labour and human rights, among others). Furthermore, Gran Tierra provides its employees with the necessary knowledge to address these human rights issues through training. Gran Tierra has implemented a policy that requires workers to report suspected activities related to any human rights violation, including forced labour and child labour, seeking to strengthen the due diligence process and prevent the materialization of these potential impacts on human rights.

## 8. Has the entity identified the parts of its activities and supply chain that imply risk of using forced or child labour?

- **Yes, we have identified risks to the best of our knowledge and will uphold our efforts to identify emerging risks.**
- Yes, we have started the risk identification process, although there are still gaps in our assessments.
- No, we have not started the risk identification process.

### 8.1 \* If the answer is yes, has the entity identified risks of forced or child labour in any of the following aspects of its activities and supply chain?

- The sector or industry in which it operates
- The types of products it produces, sells, distributes or imports
- The location of its activities, operations, or services
- The types of product it acquires
- The raw materials or commodities used in its supply chains
- First tier suppliers (direct)
- Second tier suppliers
- Third tier suppliers
- Suppliers beyond the third tier in the supply chain
- 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 risks of forced or child labour in any of the following sectors and industries? Select all that apply.**

- Agriculture, forestry, fishing, hunting
- Mining, quarrying, and oil and gas extraction
- Public services
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and storage
- Information and cultural activities
- Finance and Insurance
- Real estate, and rental and leasing
- Professional, scientific, and technical services
- Management of companies and corporations
- Administrative support services, waste management, and remediation services
- Education services
- Medical care and social assistance
- Arts, entertainment and recreation
- Lodging and food services
- Other services (except public administration)
- Public Administration
- **None of the above**
- Other, please specify

**10. Please provide additional information on the parts of the entity’s activities and supply chains that imply the risk of using forced or child labour, as well as the measures the entity has taken to assess and manage such risk (if applicable).**

GTE has a Human Rights Management System to effectively prevent, control, report, and remedy every negative impact or risk to human rights in the communities where GTE operates. It also requires its contractors to have an HSE policy in place, and to ensure the allocation of resources to minimize the risks and impacts that may be caused by their activities and presence<sup>1</sup>.

GTE requires its employees, subcontractors, and third parties to provide services to the Company in accordance with the principles enshrined in its Corporate Policies (as mentioned above), and in the case of our Supply Chain partners in a document called “*The Responsible Practices for the Respect of Human Rights<sup>2</sup> (RPRHR)*”. The RPRHR is a part of the contractual requirements that all contractors must abide by when doing business with Gran Tierra). The performance of contracts that are contrary to the principles contained in these commitments is prohibited.

Contractors are explicitly prohibited from benefitting from activities related to forced labour and child labour, as established in paragraph 10 of the RPRHR. The document further details that all contractors are required to respect the rights of children, young people and adolescents, and to report to the competent authorities any case of which they become aware or have reasonable suspicion of a violation.

In addition, Gran Tierra is one of 17 companies worldwide

participating in Shift’s Business Learning Program<sup>3</sup>. Through this program Gran Tierra Energy has benefitted greatly from the expertise that Shift has as the leading global centre for the implementation of the UN Guiding Principles on Business and Human Rights. Shift has also supported Gran Tierra in identifying risks throughout its business. They have done this by performing independent risk identification reviews of Gran Tierra’s business practices and found no risks related to forced labour or child labour within the Company’s operations, its area of influence, and in its supply chain.

Within the framework of its Human Rights policy and strategy, Gran Tierra Energy carries out ongoing Human Rights risk analysis, with the objective of always identifying places for improvement, especially in our supply chain.

**11. \* Has the entity taken any steps to remediate any forced or child labour within its activities and supply chain?**

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

<sup>1</sup>HSE, Socioenvironmental and Human Rights Handbook for Contractors.  
<sup>2</sup>Responsible Practices for the Respect of Human Rights.  
<sup>3</sup><https://shiftproject.org/what-we-do/business/business-learning/>



**11.1 If the answer is yes, what remediation measures has the entity taken? Select all that apply.**

- 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 the measures the entity has taken to remediate any forced or child labour (if applicable).**

Gran Tierra’s Human Rights Due Diligence Process is ongoing and complies with international standards to ensure the proper management of any issues related to child or forced labour in the company and its supply chain. The Due Diligence Process is the Company’s main tool to identify potential risks and address them effectively through management measures. As outlined above the Company works with the Shift project, involving the entire operation to constantly evaluate and improve this process.

GTE has created the necessary tools to manage complaints filed with respect to any Human Rights violation, including cases of forced or child labour. The Company,

its workers, and its supply chain are obliged to collaborate with local, national, and international authorities, including on any investigations. In addition, the company has its own grievance management mechanism for addressing requests, complaints, claims, and compliments, called Gran Tierra Te Escucha (Gran Tierra listens to you). This program includes many ways for people to contact the Company including by mail, email, phone and physical offices that provide easily accessible channels for community members to raise issues and engage in two-way communications with the Company.

Gran Tierra is also committed to maintaining an open dialogue with local, regional, and national governments, local communities, civil organizations and NGOs in the areas where it operates, so it can obtain key information to identify and address risks of child and forced labour, and report progress relative to risk management.

One example of the work that GTE has undertaken to remediate forced child labour is through a project with the FC Barcelona Foundation and Colombia’s Agency for Reincorporation and Normalization (ARN). This strategic alliance works to increase resilience in vulnerable children and reduce their susceptibility to two important Human Rights concerns in the area: substance abuse and militia recruitment.

Financed by GTE, the program is implemented by the Youth Violence Prevention Program of the Barça Foundation and uses sport as a unifying tool for children from vulnerable populations,

children living in poverty and descendants of Afro-Indigenous minorities to learn about conflict resolution, prosocial behaviour development and other important life skills. Expected long-term outcomes include community stabilization and normalization, greater education attainment, increased employment and positive health indicators.

According to the Colombian Family Welfare Institute (ICBF), the project has been effective in preventing forced recruitment of minors, having documented multiple cases of preventions in program participants.

**13. \*Has the entity taken any measures to remedy the loss of income in vulnerable families resulting from any measures taken to eliminate the use of forced or child labour?**

- Yes, we have taken substantial remedial action and will continue to identify and address any gaps in our response.
- Yes, we have taken some remedial action, but there are still gaps in our response that need to be addressed.
- No, we have not taken any remedial action.
- **Not applicable, we have not identified any loss of income for vulnerable families as a result of measures taken to eliminate the use of forced or child labour in our activities and supply chains.**





**14. Please provide additional information on the measures taken by the entity to remedy the loss of income for the most vulnerable families resulting from any measures taken to eliminate the use of forced or child labour in its activities and supply chains (if applicable).**

Not applicable as per question 13.

**15. \*Does the entity provide training to employees on forced labour and child labour?**

- **YES**
- No

**15.1 \* If the answer is yes, is the training mandatory?**

- Yes, training is mandatory for all employees.
- **Yes, training is mandatory for employees responsible for taking contracting or purchasing decisions.**
- **Yes, training is mandatory for some employees.**
- No, training is voluntary.

**16. Please provide additional information about the training the entity provides to employees on forced labour and child labour (if applicable).**

A fundamental part of GTE’s commitment to respect and promote Human Rights is the integration of the company’s Human Rights Policy at all levels. Gran Tierra conducts many different activities aimed at

strengthening and enhancing the knowledge of human rights and the corporate Human Rights policy among its employees, contractors and those in our supply chain.

Training is an important part of that strategy, whereby the Company is focused on creating a business culture based on respect for Human Rights. By having ongoing and consistent training opportunities the Company trains its team and contractors in the concepts of human rights and how to understand and adhere to our human rights policy, in order to prevent any human rights violations as a result of our operations. This includes the detection and prevention of forced and child labour.

Gran Tierra also believes in the importance of strengthening Human Rights management in its supply chain. That’s why, since 2021, the Company has implemented a program focused on our contracting companies to strengthening their understanding and implementation of good Human Rights practices. This work has been done in collaboration with two key partners, Hemisferio Consultores and academia through the ICESI University.

To date, more than 20 local companies adjacent to Gran Tierra’s operations in both Southern and Northern Colombia have participated in the program, receiving training and education on Human Rights and Business.

In addition, participants have been provided with continuous support to create and formalize

Human Rights policies of their own. This has translated into an increased commitment among Gran Tierra’s suppliers for the respect and promotion of human rights in their businesses.

We have new operations in Ecuador that are currently growing and as a result, in 2023 we carried out human rights-focused training, led by Shift, on the standards of the Guiding Principles of Human Rights and Business. This training workshop was attended by 60 people, the majority being of our supply chain partners but also in attendance were government officials and civil society organizations. In addition, we held a session with 19 of the Company’s supply chain partners in Lago Agrio (a town close to our operations). At this session we explained the GTE Human Rights Policy, our operating philosophy and the requirements to apply our corporate policies and contractual clauses that speak to the respect and protection of Human Rights.

**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?**

- **YES**
- No



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

- **Establishing a periodic review or audit of the organization’s policies and procedures related to forced and child labour.**
- **Tracking relevant performance indicators, such as employee awareness levels, number of cases reported and resolved through complaints mechanisms, and number of contracts with clauses against forced and child labour.**
- **Collaborating 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 and child labour, including tracking relevant performance indicators.**
- Other, please specify.

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that no forced or child labour are used in its activities and supply chains (if applicable).**

Throughout the performance of goods and services contracts, GTE conducts reviews by means of strict audits of data and evidence to ensure labour compliance, including salary and social security payments. Furthermore, the Company provides an open communication channel to each link in the supply chain for reporting any irregular situations.

Gran Tierra also has a robust grievance management system where it tracks and keeps a record of all requests, complaints and claims that can be submitted to the Company by anyone. This process details the issues resolved and those that are underway to ensure the proper management of our operations, including Human Rights issues. It also allows us to see any areas that require attention for improvement. In the years 2020, 2021, 2022 and 2023, Gran Tierra Energy’s complaints mechanism did not report any forced or child labour violations, caused either by the Company’s presence or within its supply chains.

Through its ongoing due diligence process, strong training of employees and contractors, a grievance management structure in place for issues to be reported and with robust regulations for our supply chain, GTE has a solid structure in place to identify and address any issues related to forced and child labour.

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Gary S. Guidry  
Director  
May 31, 2024  
(signed)

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I have the authority to bind Gran Tierra Energy Inc.