

International Petroleum Corporation

# Modern Slavery Report

# 2023

May 27, 2024



This report (the “**Report**”) has been prepared by International Petroleum Corporation (“**IPC**”) in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the “**Act**”) for the year ended December 31, 2023. This Report is a joint report made by IPC on behalf of itself and its subsidiaries that may be determined to be reporting entities under the Act (collectively, the “**Reporting Entities**”) for the year ended December 31, 2023.

For the purposes of this Report, the Reporting Entities other than International Petroleum Corporation are as follows:

Reporting Entity	Country of Registration	Principal Business
IPC Canada Ltd.	Canada	Oil and Gas Operations
International Petroleum BV	The Netherlands	Holding Company
IPC Malaysia BV	The Netherlands	Oil and Gas Operations
IPC SEA Holding BV	The Netherlands	Oil and Gas Operations
Lundin Services Limited	Malaysia	Oil and Gas Operations
IPC Petroleum Holdings SA	France	Holding Company
IPC Petroleum France SA	France	Oil and Gas Operations
IPC Petroleum Gascogne SNC	France	Oil and Gas Operations

In this Report, unless otherwise stated, references to “IPC”, the “Group”, “we”, “us”, “our”, “its” and similar expressions include all the Reporting Entities.

## 1. Introduction

Forced labour and child labour, as defined in the Act, (together “**modern slavery**”) are crimes and serious violations of human rights. As an international oil and gas company, IPC recognizes the important role that we have in ensuring that our operations, and the supply chains that support our operations, adhere to the highest ethical standards, including the prevention and identification of modern slavery in our supply chain.

This Report describes the policies and processes we have implemented, and sets out the steps we have taken during the year ended December 31, 2023, to prevent and reduce the risk that modern slavery occurs at any step in the production of goods by IPC or of goods imported by IPC or third parties supplying IPC, as defined in and required by the Act.

## 2. Our Business

International Petroleum Corporation is an international oil and gas company incorporated in British Columbia, Canada with its common shares listed on the Toronto Stock Exchange and the Nasdaq Stockholm (ticker “**IPCO**”). The business of IPC is exploring for, developing and producing oil and gas. IPC holds a portfolio of oil and gas production assets and development projects in Canada, Malaysia and France.

As at December 31, 2023, the Group operated its produced volumes in Canada (Alberta and Saskatchewan), France (Paris Basin) and Malaysia, and owned non-operated interests in France (Aquitaine Basin). As at that date, IPC had a total of 271 employees located in Canada, Malaysia, France and Switzerland providing the Group with the managerial, operational, technical, financial and locally specific knowledge and experience to ensure effective and efficient management of IPC’s oil and gas assets.

IPC conducts its business responsibly, exploring for and producing oil and gas in an economically, socially and environmentally responsible way. IPC respects human rights and protects the health and safety of employees and the natural environment. IPC is committed to the continued advancement of our environmental, social and governance (ESG) practices in our sustainability focus areas. The Corporation's Sustainability Policy is articulated around the Corporation's six sustainability priorities: health and safety, rewarding workplace, communities, climate action, environmental stewardship, and ethics and integrity. The framework aligns with the United Nations Sustainable Development Goals and IPC's UN Global Compact commitments.

Additional information regarding the corporate structure, operations and the industry conditions relating to IPC is available in the Corporation's Annual Information Form for the year ended December 31, 2023, which can be accessed on our website at [www.international-petroleum.com](http://www.international-petroleum.com) or on SEDAR+ at [www.sedarplus.ca](http://www.sedarplus.ca). For further details on IPC's commitment to the environment and the communities we operate in, please see our annual Sustainability Reports on our website at [www.international-petroleum.com](http://www.international-petroleum.com).

### 3. Our Policies

#### Policies

Through our policies ("Policies") approved and adopted by our Board of Directors, we communicate our values and expectations, setting high standards of business conduct for ourselves and our suppliers, and express that we do not tolerate any form of modern slavery. We are committed to consistently evolving and improving our processes. We do not allow modern slavery in any of our operations or by suppliers working with us. Our relevant Policies include the following:

##### *Code of Business Conduct and Ethics*

We are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct and Ethics is the foundation of our Group policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, IPC's directors, officers, employees and contractors should always act lawfully, ethically and in the best interests of IPC.

##### *Supplier Code of Conduct*

IPC's Supplier Code of Conduct details the requirements and expectations we have of our suppliers, their supply chains, and other service providers with whom we engage. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain.

##### *Sustainability Policy*

IPC's Sustainability Policy sets out the Group's sustainability priorities, including ethics and integrity. We have policies in place to ensure ethical business practices are applied throughout the Group. Risk management reviews take place regularly, and IPC maintains a strong and independent internal audit function. In respect of contractors, the Sustainability Policy provides that we strive to ensure at all times that human rights are not infringed in our supply chain and that labour laws are complied with.

### *Human Rights Policy*

As stated in IPC's Human Rights Policy, IPC is committed to respecting internationally recognised human rights and not to infringe on individuals' human rights, nor be complicit or contribute directly or indirectly to human rights abuses.

### *Anti-Corruption, Anti-Fraud and Anti-Money Laundering Policies*

IPC has adopted an Anti-Corruption Policy that prohibits all forms of corruption, including direct, indirect, active and passive forms, in all of the Corporation's activities, including charitable contributions, sponsorships and community-based initiatives. The Corporation's Anti-Fraud Policy has the objective of preventing fraud and enhancing IPC's governance and internal control standards for its business activities. IPC's Anti-Money Laundering Policy states the Corporation's commitment to the highest standards of integrity and compliance in striving to prevent money laundering or potential unintended financing of criminal activities.

### *Whistleblowing Policy*

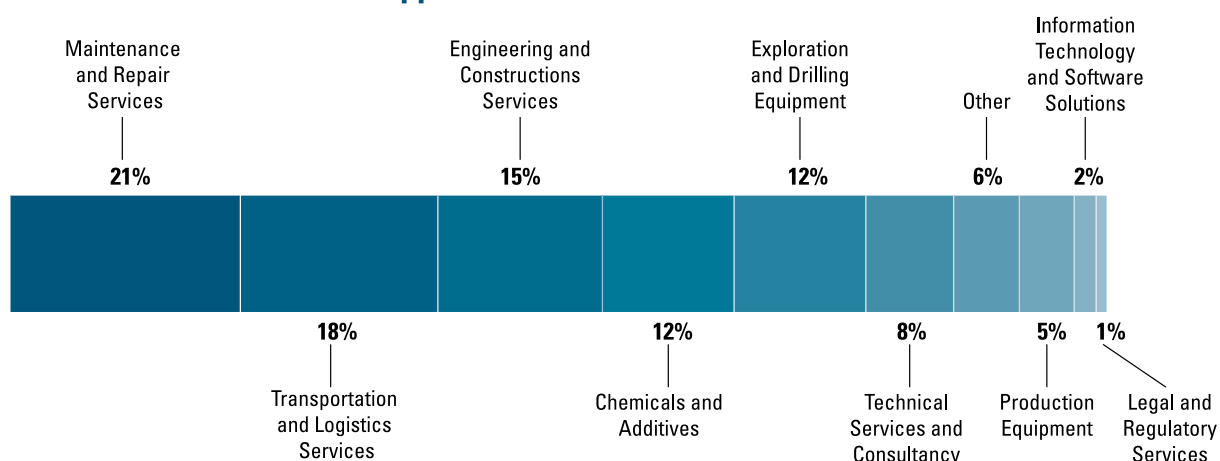
IPC is committed to conduct operations in an honest, transparent and ethical manner and encourages employees, former employees and contractors of the Company or any of its affiliates who have serious concerns about any aspect of the business to raise them and to disclose any information which relates to improper, unethical or illegal conduct in the workplace. IPC's Whistleblowing Policy provides a mechanism to report concerns regarding wrongdoing without fear of victimization, subsequent discrimination, or disadvantage. To ensure independence, we engage a third-party service for the reporting and investigation of concerns regarding improper, unethical or unlawful conduct in the workplace. Individuals governed by the Whistleblowing Policy are entitled to report any such improper conduct on a confidential and, if preferred, anonymous basis, including by submitting a report to the independent third-party service provider, via online platform, telephone, email or mail.

## **4. Overview of Our Supply Chain**

IPC's supply chain includes businesses that supply goods and services to our Group, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations in developing and maintaining our oil and gas assets.

In 2023, key goods and services procured by IPC included: oil and gas related equipment, construction services, electricity, transportation services, offshore operations support services, diluent and fuel gas, supplies and contractors related to drilling and other operational services, external legal, accounting and sustainability advisory services, and information technology and cybersecurity risk assistance.

## Supplier of Goods and Services 2023



Most of our suppliers are domiciled in the country where our operations are conducted, being Canada for our Canadian operations, Malaysia for our Malaysian operations and France for our French operations. We acknowledge that our suppliers may supply us with products that originate from other jurisdictions and such suppliers may have their own global supply chains. As part of our commitment to ensure that our contracting and procurement activities are done in compliance with our Policies, we continue to review and map our supply chains worldwide.

During 2023, IPC conducted a supplier mapping exercise of its top 100 suppliers, representing 91% of the Group's total procurement expenditure in 2023, to facilitate a more comprehensive understanding of the modern slavery risks that may be present in our supply chain.

When measured by value, IPC's procurement expenditure of these top suppliers was 99% within Canada, France and Malaysia, much of which was spent supporting local businesses and service providers. The remaining expenditure occurred in European countries, other than France.

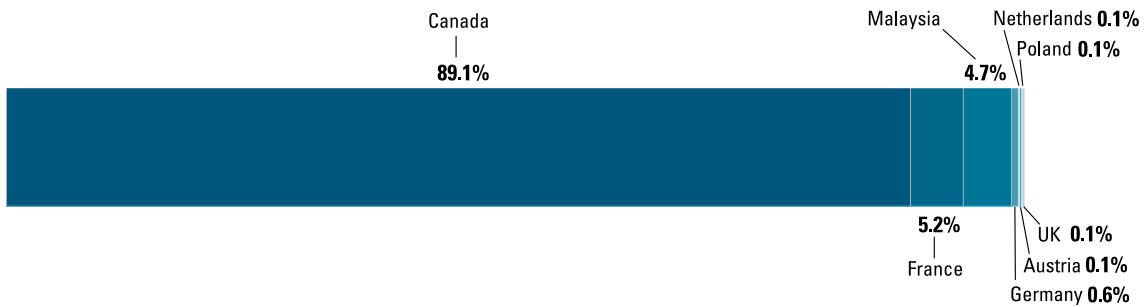
When measured by value, only a fraction of IPC's procurement expenditure was spent with suppliers from countries reported to have medium risk of "Global Slavery".<sup>1</sup>

<sup>1</sup> [www.walkfree.org/global-slavery-index/map/](http://www.walkfree.org/global-slavery-index/map/)

### IPC Total Procurement Expenditure 2023



### Geographical Breakdown of IPC Top 100 Suppliers 2023



### Regional Risk Exposure of IPC Top 100 Suppliers 2023



Among the countries of our top suppliers in 2023, two rank medium risk on the Global Slavery Index. All others rank low risk.

High Risk <sup>(1)</sup>	Medium Risk <sup>(1)</sup>	Low Risk <sup>(1)</sup>
<ul style="list-style-type: none"> <li>• none</li> </ul>	<ul style="list-style-type: none"> <li>• Malaysia</li> <li>• Poland</li> </ul>	<ul style="list-style-type: none"> <li>• Canada</li> <li>• France</li> <li>• Germany</li> <li>• Austria</li> <li>• The Netherlands</li> <li>• United Kingdom</li> </ul>

Malaysia, as one of IPC’s countries of operation, is a jurisdiction where IPC has worked since inception. While the medium risk ranking may derive from industries in the country requiring low skilled workers, such as agriculture and manufacturing, the oil and gas industry in Malaysia is highly regulated and in general, requires workers with technical skills and expertise. In fact, all companies wishing to supply goods or services to Malaysia’s oil and gas industry, including to IPC, must be licensed by PETRONAS, Malaysia’s national energy company. In order to receive and maintain a license from PETRONAS, service providers must meet various corporate, commercial and technical requirements.

## 5. Assessing Our Risk

We believe that IPC's risk of directly employing or contracting labour considered to be modern slavery is very low given the well-developed employment laws in the jurisdictions of our operations, the technical training and skills required for most of our technical and operational activities, and our corporate monitoring and management of employment and contracting policies and practices.

We also expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. We expect compliance with our Supplier Code of Conduct and we are working to enhance due diligence procedures throughout the Group with respect to the on-boarding of new suppliers.

IPC seeks to identify, assess, and manage supplier risk. To identify the business activities with the greatest exposure to these risks, we consider many factors, including new or non-transparent supply chains as well as jurisdictional risks including poverty, conflict, and enforcement of international human rights standards. Our exposure to the risk of modern slavery increases when we engage with third parties, particularly in categories where materials sourced in whole or in part internationally through third parties.

## 6. Our Commitments

IPC is committed to upholding the highest standards of ethical conduct, including the prevention of modern slavery in all aspects of our operations.

As an international oil and gas company, we recognize our responsibility to ensure that modern slavery is not used at any step of the production of goods, whether within Canada or abroad, by the Group or within our supply chains. Below outlines the steps we are planning to undertake to further address and mitigate these risks:

- Continuing to review and map our supply chains in our areas of operations;
- Continuing to monitor compliance with the Supplier Code of Conduct of new and existing suppliers;
- Assessing where further policies and processes for identifying, addressing and prohibiting modern slavery in the Group's activities and supply chains may be required;
- Training activities; and
- Continuing to encourage the reporting of any concerns or suspicions of modern slavery.

### Remediation Measures

In accordance with the Act, IPC continues to review and assess our activities and supply chains. For the year ended December 31, 2023 and to the date of this Report, we have not identified any incident of modern slavery within the Group. Therefore, during the year ended December 31, 2023, we did not need to take any measures to remediate an incident of modern slavery.

IPC acknowledges the importance of vigilance and ongoing monitoring to ensure that modern slavery risks remain mitigated within our operations and supply chains. We are committed to regularly reviewing our risk assessments and implementing any necessary remediation measures should the need arise in the future.

Our Policies, including our Whistleblowing Policy, require all employees and contractors of IPC to report actual or possible breaches of law or Policy, or similar misconduct. We also undertake efforts to ensure that the risk of modern slavery is mitigated in our business. In the event that we discover any modern slavery in our business and supply chains, we would take one or more of the following measures to remediate such modern slavery:

- Support for victims of modern slavery and/or their families;
- Actions to prevent modern slavery from continuing or reoccurring;
- Facilitating grievance mechanisms; and
- Contractual remedies against suppliers engaging in such misconduct.

## **Training**

IPC personnel at all levels are required to adhere to our Code of Business Conduct and Ethics and ensure that it is understood and properly applied to their daily activities. Every new employee of IPC must review and sign our mandatory Code of Business Conduct and Ethics, and is informed of how to report misconduct under our Whistleblowing Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge of our Code of Business Conduct and Ethics, as well as the concerns relating to modern slavery.

In 2023, IPC conducted in-person internal training sessions with the Company's senior management and in-country operations, finance and HSE teams in Canada, France and Malaysia. The training materials were prepared in-house and focused on raising awareness about modern slavery risks and the upcoming regulatory changes.

## **Supplier Engagement**

We intend to continue to engage with our suppliers to raise awareness of modern slavery risks and provide guidance on implementing best practices for prevention and mitigation.

## **7. Our Progress and Effectiveness**

As part of our governance processes, we monitor compliance with our Policies on an ongoing basis. We would also review any concerns raised through our Whistleblowing Policy and other informal mechanisms of employee feedback. For the year ended December 31, 2023 and to the date of this Report, no concerns or complaints regarding modern slavery have been identified.



## 8. Approval and Signature

This Report was approved by the Board of Directors of International Petroleum Corporation as a joint report on May 23, 2024, on behalf of itself and the other Reporting Entities, for the financial year ended December 31, 2023, in accordance with the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for International Petroleum Corporation and the other Reporting Entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have authority to sign this Report on behalf of International Petroleum Corporation and the other Reporting Entities.

**“William Lundin”**

*William Lundin*

*President, Chief Executive Officer and Director,*

*May 27, 2024*

## Forward-Looking Statements


This report contains statements and information which constitute "forward-looking statements" or "forward-looking information" (within the meaning of applicable securities legislation). Such statements and information (together, "forward-looking statements") relate to future events, including the Corporation's future performance, business prospects or opportunities. Actual results may differ materially from those expressed or implied by forward-looking statements. The forward-looking statements contained in this report are expressly qualified by this cautionary statement. Forward-looking statements speak only as of the date of this report, unless otherwise indicated. IPC does not intend, and does not assume any obligation, to update these forward-looking statements, except as required by applicable laws.

All statements other than statements of historical fact may be forward-looking statements. Any statements that express or involve discussions with respect to predictions, expectations, beliefs, plans, projections, forecasts, guidance, budgets, objectives, assumptions or future events or performance (often, but not always, using words or phrases such as "seek", "anticipate", "plan", "continue", "estimate", "expect", "may", "will", "project", "forecast", "predict", "potential", "targeting", "intend", "could", "might", "should", "believe", "budget" and similar expressions) are not statements of historical fact and may be "forward-looking statements". Forward-looking statements include, but are not limited to, statements with respect to: the ability to map supply chains; the steps taken to prevent and reduce risks of modern slavery; the implementation of policies in relation to modern slavery and the ability to monitor and enforce compliance with such policies by the Group or by service providers; training provided to employees; business strategy and outlook; remediation measures in respect of modern slavery; maintenance of existing supplier and partner relationships; supply channels; and other such matters.

The forward-looking statements are based on certain key expectations and assumptions made by IPC, including expectations and assumptions concerning: prevailing commodity prices and currency exchange rates; applicable royalty rates and tax laws; interest rates; future well production rates and reserve and contingent resource volumes; operating costs; our ability to maintain our existing credit ratings; our ability to achieve our performance targets; the timing of receipt of regulatory approvals; the performance of existing wells; the success obtained in drilling new wells; anticipated timing and results of capital expenditures; the sufficiency of budgeted capital expenditures in carrying out planned activities; the timing, location and extent of future drilling operations; the successful completion of acquisitions and dispositions and that we will be able to implement our standards, controls, procedures and policies in respect of any acquisitions and realize the expected synergies on the anticipated timeline or at all; the benefits of acquisitions; the state of the economy and the exploration and production business in the jurisdictions in which IPC operates and globally; the availability and cost of financing, labour and services; our intention to complete share repurchases under our normal course issuer bid program, including the funding of such share repurchases, existing and future market conditions, including with respect to the price of our common shares, and compliance with respect to applicable limitations under securities laws and regulations and stock exchange policies; and the ability to market crude oil, natural gas and natural gas liquids successfully.

Although IPC believes that the expectations and assumptions on which such forward-looking statements are based are reasonable, undue reliance should not be placed on the forward-looking statements because IPC can give no assurances that they will prove to be correct. Since forward-looking statements address future events and conditions, by their very nature they involve inherent risks and uncertainties. Actual results could differ materially from those currently anticipated due to a number of factors and risks. These include, but are not limited to: the risks associated with the oil and gas industry in general such as operational risks in development, exploration and production; delays or changes in plans with respect to exploration or development projects or capital expenditures; the uncertainty of estimates and projections relating to reserves, resources, production, revenues, costs and expenses; health, safety and environmental risks; commodity price fluctuations; interest rate and exchange rate fluctuations; marketing and transportation; loss of markets; environmental risks; competition; Innovation and cybersecurity risks related to our systems, including our costs of addressing or mitigating such risks; The ability to attract, engage and retain skilled employees; incorrect assessment of the value of acquisitions; failure to complete or realize the anticipated benefits of acquisitions or dispositions; the ability to access sufficient capital from internal and external sources; failure to obtain required regulatory and other approvals; Geopolitical conflicts, including the war between Ukraine and Russia and the conflict in the Middle East, and their potential impact on, among other things, global market conditions; and changes in legislation, including but not limited to tax laws, royalties and environmental regulations. Readers are cautioned that the foregoing list of factors is not exhaustive.

Additional information on these and other factors that could affect IPC, or its operations or financial results, are included in IPC's annual information form for the year ended December 31, 2023 (See "Cautionary Statement Regarding Forward-Looking Information", "Risks Factors" and "Reserves and Resources Advisory" therein), in the management's discussion and analysis (MD&A) for the three months ended March 31, 2024 (See "Cautionary Statement Regarding Forward-Looking Information", "Risks Factors" and "Reserves and Resources Advisory" therein) and other reports on file with applicable securities regulatory authorities, including previous financial reports, management's discussion and analysis and material change reports, which may be accessed through the SEDAR+ website ([www.sedarplus.ca](http://www.sedarplus.ca)) or IPC's website ([www.international-petroleum.com](http://www.international-petroleum.com)).



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