



## **2023 Modern Slavery Report – Petrus Resources Ltd.**

Petrus Resources Ltd. ("**Petrus**", "**we**", "**our**" or the "**Corporation**") has created this report to meet our requirements pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**").

Forced labour and child labour (each as defined in the Modern Slavery Act and hereinafter together referred to as "**modern slavery**") are violations of fundamental human rights and are occurring across the globe. As a Canadian oil and gas company, we recognize the responsibility we have to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes no use of modern slavery in our business or supply chains.

The Corporation is a reporting entity as defined in the Modern Slavery Act. This report covers the Corporation's activities and the activities of our subsidiaries, Petrus Resources Corp. and Petrus Resources Inc. (together, the "**Subsidiaries**"), during our previous financial year, being from January 1, 2023 to December 31, 2023.

The Corporation takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We will continue to evaluate and assess our processes with respect to modern slavery in our business and supply chains over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

### **Steps Taken During 2023**

The Corporation first became aware of the Modern Slavery Act in late 2023 and subsequently engaged our legal counsel to assist in navigating the new reporting regime. As a result of the timing of becoming aware of the new reporting requirements, we did not take any steps in 2023 in relation to reducing the risks of modern slavery occurring in the Corporation's supply chain; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We intend to continue to evaluate our reporting processes to ensure that our reporting with respect to modern slavery meets the statutory requirements.

### **Structure, Activities and Supply Chains**

- **Structure:** The Corporation is incorporated under the *Business Corporations Act* (Alberta) (the "**ABCA**") and has two wholly owned subsidiaries, Petrus Resources Corp. and Petrus Resources Inc., that are also incorporated under the ABCA. We have approximately 40 employees and contractors in Alberta, Canada.
- **Activities:** We are engaged in the exploration and development of oil and gas properties located in Alberta, Canada. Our production averaged 10,301 barrels of oil equivalent per day during the year ended December 31, 2023, comprised of approximately 70% natural gas and 30% crude oil and natural gas liquids.

- **Supply chains:** We procure goods and services from approximately 5,600 suppliers and contractors. The suppliers we engage are virtually all located in Canada and as such are subject to laws and regulations in effect in Canada, including the Modern Slavery Act. A small number of the suppliers we engage are located in the United States and as such are subject to laws and regulations in effect in the United States, including anti-modern slavery laws in the United States.

Additional information regarding the corporate structure and operations of the Corporation can be found in our 2023 Annual Information Form/audited annual financial statements and related management's discussion and analysis for the year ended December 31, 2023, which are posted on our website ([Financial Reports — Petrus Resources Ltd.](https://www.sedarplus.ca)) and filed on SEDAR+ ([www.sedarplus.ca](http://www.sedarplus.ca)).

## **Policies and Due Diligence**

### ***Policies***

The Corporation does not currently have any specific policies in place in relation to mitigating risks related to modern slavery. However, the Corporation has several relevant policies in place that reflect our values and set clear expectations for our directors, officers, independent contract workers and employees, including in relation to compliance with all applicable laws:

- **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 (the "**Code**") is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Petrus' employees, officers, directors, independent contract workers and other agents that conduct activities on behalf of Petrus ("collectively, "**Petrus Representatives**") should always act lawfully, ethically and in the best interests of Petrus.
- **Compliance with Laws**  
Our Code provides that Petrus Representatives must be aware of and comply with all applicable laws, rules and regulations as locally interpreted and administered in all jurisdictions in which the Corporation conducts business. Petrus Representatives have a duty to inform themselves of any laws relevant to their particular activities.
- **Whistleblower Policy**  
Petrus' Whistleblower Policy provides a mechanism for employees, management, officers, directors, contractors, consultants, vendors, customers and committee members to confidentially and anonymously report complaints and concerns regarding accounting, internal controls, auditing matters and matters set forth in Petrus' Code (including any violation of applicable laws, such as the Modern Slavery Act) without the fear of victimization, discrimination or disadvantage.

In addition to the above, we will continue to evaluate our approach with respect to modern slavery to ensure the effectiveness of our methodology, including to determine whether it is necessary to amend our existing policies and/or implement new policies to mitigate the risks of modern slavery from occurring in our business or supply chains.

### ***Due Diligence***

Given the timing of the implementation of the Modern Slavery Act, the Corporation has not historically undertaken any steps to conduct due diligence relating to mitigating the risks of modern slavery occurring in relation to our business or supply chains; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains. We may in the future consider implementing additional procedures to ensure we are not unknowingly engaged in business with any entities involved in modern slavery.

### **Activity and Supply Chain Risks**

The Corporation is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains. As noted above, most of our suppliers are located in Canada and a small number of our suppliers are located in the United States, and as such, all of our suppliers are subject to laws and regulations in effect in Canada and/or the United States.

### **Remediation Measures**

We are not aware of the existence of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any measures to remediate any modern slavery. As a result, we have not had to take any measures to remediate the loss of income to the most vulnerable families that resulted from any measure taken by us to eliminate the use of modern slavery in our activities and supply chains.

### **Employee Training**

The Corporation has ensured that all employees are aware of the new reporting requirements under the Modern Slavery Act. However, we do not currently have an employee training program in place with respect to the identification and prevention of modern slavery in our business and supply chains. We may consider implementing a training program in the future if we consider it necessary to do so.

Petrus Representatives are required to understand and adhere to our Code and ensure that it is properly applied in their daily activities. Every new employee of Petrus must review and sign our Code, and is informed of how to report wrongdoing under our Whistleblower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge of our various internal policies.

### **Assessment of Effectiveness**

The Corporation has not yet implemented any policies or processes to assess our effectiveness in ensuring that modern slavery is not used in the Corporation's business or supply chains.

### **Approval and Attestation of the Report**

This report was approved by the Corporation's Board of Directors in respect of the Corporation and its Subsidiaries on May 23, 2024 pursuant to paragraph 11(4)(b)(ii) of the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of the Corporation, and with no personal liability, that the information in this report is true,

accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

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(Signed) "*Ken Gray*"

Ken Gray  
Director, President and CEO  
May 23, 2024

I have the authority to bind the Corporation.