

Modern Slavery Transparency Report

1. Introduction

Spoke is committed to preventing slavery, forced or compulsory labour and human trafficking in its corporate activities, and to ensuring that its business and supply chains are free from slavery, forced or compulsory labour and human trafficking. In accordance with our obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), this report sets out the steps taken by Spoke to ensure that slavery, forced or compulsory labour and human trafficking is not taking place in any part of our business or supply chains.

2. Our Business

Spoke has one active entity, six employees and is incorporated in Alberta, Canada. The active entity carries on business in the upstream oil and gas industry within Alberta and British Columbia, Canada, including operating petroleum and natural gas wells, facilities and pipelines. Spoke’s operations are largely conducted under a master services agreement (“MSA”) with an independent third party. Spoke is also a party to several non-operated joint venture partnerships that operate petroleum and natural gas wells, facilities and pipelines.

3. Our Supply Chains

As holder of both operated and non-operated interests, we recognise that the requirements of the Act are especially relevant to the supply chain of Spoke. Spoke’s commercial activity is exclusively carried out in Canada. Management of our upstream petroleum and natural gas development and production operations business in Canada, and related supply of products to that development and production operations are carried out in Canada. We have no other commercial activities in the world. In relation to our business in Canada, our suppliers comprise large and well-established Canadian companies, primarily in the petroleum industry. Spoke also engages with a number of contractors for professional and other services locally in Canada.

4. Risk Assessment and Training

We consider the jurisdictions in which Spoke operates to be low risk in relation to modern slavery. Nevertheless, we recognize that all organizations are susceptible to the risk of overlooking modern slavery in all its forms, and key staff, including MSA staff, are trained to be alert to circumstances amounting to modern slavery. These members of staff are expected and encouraged to raise concerns with management who then take action.

5. Guidelines and practices

The MSA provider’s Employee Handbook includes Ethical Standards under its guidelines and practices, and is designed to communicate commitment to ethical business conduct and to provide guidance to all MSA employees as they apply these principles every day in performing their responsibilities. Included within the Employee Handbook are systems, controls and guidance to employees to ensure that unethical standards, such as modern slavery and human trafficking, are not taking place within our business or supply chains.

6. Roles and Responsibilities:

Board

- Through governance oversight, aligns Spoke's activities with this statement and the Act.

CEO/Executive Team

- Creates a culture that values prevention, manages risk, rectifies issues, and ensures staff receive appropriate training.

MSA provider management

- Ensures clients and partners are not engaged in prohibited practices, assesses, and manages risk, and reports concerns to the Executive Team, and ensures MSA staff receive appropriate training.
- Ensures compliance to the MSA provider Employee Handbook policies, guidelines and practices.
- Ensures that a regular review of the MSA provider Employee Handbook policies, guidelines and practices policy is conducted.
- Reports through to the Spoke board any confirmed Forced Labour and Child Labour.
- Implements recruitment practices that guard against Forced Labour and Child Labour.
- Provides resources for MSA staff to understand and adhere to the MSA provider Employee Handbook policies, guidelines and practices and

Staff and contractors of the MSA provider

- Understands and adheres to the MSA provider Employee Handbook policies, guidelines and practices, reports concerns, and participates in provided training.

7. Statement:

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 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.”



Mark Smith
Director and Chief Executive Officer
May 27, 2024

“I have the authority to bind “Spoke Resources Ltd.”