



Fighting Against Forced  
Labour and Child Labour  
Report

2023



## INTRODUCTION

This joint report (the “Report”) constitutes Tourmaline Oil Corp. and its subsidiaries Bonavista Energy Corporation and Tourmaline Oil Marketing Corp.’s (together, “Tourmaline”, the “Company”, “we” or “our”) response to the reporting requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). It covers the Company’s activities during our most recently completed financial year from January 1, 2023 to December 31, 2023 (the “Reporting Period”).

The Report outlines the steps Tourmaline has taken during the Reporting Period to prevent and reduce the risk that forced labour or child labour (each as defined in the Act and together referred to as “modern slavery”) is being used in our business and supply chains.

The Company 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 over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

## STEPS TAKEN DURING THE REPORTING PERIOD

Tourmaline has adopted policies and procedures that set out key principles that the Company, its stakeholders, and its representatives share in conducting business ethically. Tourmaline believes that ethical business practices are fundamental to long-term sustainability and ensures that all representatives of Tourmaline uphold and respect human rights as reflected in the UN Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms.

During the Reporting Period, Tourmaline took several steps to prevent and reduce the risk that modern slavery is being used in our business and supply chains. Specifically, we:

- Established an internal working group to assess our current procedures and strengthen our current governance structure for handling modern slavery risks in our operations and supply chains.
- Engaged in conversations with key committees of the Board about the Act.
- Initiated various training and educational efforts to increase awareness among our senior management and key business units about our human rights policies and procedures concerning modern slavery.
- Initiated a review of existing internal policies and procedures against the requirements of the Act, particularly focusing on the prevention of modern slavery in our supply chain.
- Engaged an independent third-party outside of the Reporting Period to undertake a risk assessment of our operational activity and a subset of our Tier-1 supplier base and to provide us with a gap analysis of our current policies and procedures for preventing modern slavery in our supply chain, procurement and compliance processes.
- Began mapping our business activities and Tier-1 suppliers and gathering information on these suppliers to understand and identify risks associated with our supply chain.
- Engaged our internal and external legal counsel to further assist us with our reporting requirements under the Act, which consisted of a number of meetings in which they provided advice to us in advance of, and following, the release of the government guidance in December 2023 pertaining to the Act.

We acknowledge that we are embarking on an extensive journey to understand and address modern slavery in our business. We plan to build upon the groundwork undertaken in the first Reporting Period, emphasizing practical and cooperative strategies using the outcomes of our business mapping activities and the gap analysis that was conducted outside of the Reporting Period to inform the creation of our plan to combat modern slavery in our supply chains. Beyond the Reporting Period, we outlined a strategy to refine our modern slavery risk management procedures on a mid- to long-

term basis. We formulated a detailed 12-month plan, along with a multi-year strategy, to counter modern slavery. This will include:

- Establishing a governance structure to ensure responsibility and accountability for modern slavery risk management and the implementation of commitments, with overall responsibility assigned to a member of the executive team.
- Developing and implementing due diligence procedures and processes as part of the supplier onboarding process that will assist in identifying, addressing, and prohibiting the use of modern slavery in their activities and supply chains.
- Creating a Supplier Code of Conduct that clearly articulates minimum expectations of ethical compliance from suppliers.
- Adding a specific reference to the Human Rights Policy in supplier contracts and requiring suppliers to confirm compliance with the policy prior to onboarding.
- Framing a corrective plan detailing responses in the event of possible allegations of modern slavery.
- Begin mapping our Tier-2 suppliers and developing a stakeholder engagement framework to proactively interact with stakeholders.
- Designing a supplier management framework for Tourmaline to carry out supplier due diligence.

## STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

### Structure

Tourmaline is a Canadian company incorporated under the Business Corporations Act (Alberta) and is headquartered in Calgary, Alberta, Canada. Tourmaline's common shares trade on the Toronto Stock Exchange (TSX) under the symbol TOU. During the Reporting Period, Tourmaline had two reporting entities that were wholly owned by Tourmaline: "Bonavista Energy Corporation" (operating in Canada) which was amalgamated with Tourmaline on Jan 1, 2024, and "Tourmaline Oil Marketing Corp" (operating in the USA).

### Activities

Tourmaline is Canada's largest natural gas producer dedicated to producing the lowest-emission, and lowest-cost, natural gas in North America. We are an investment grade exploration and production company providing strong and predictable operating and financial performance through the development of our three core areas in the Western Canadian Sedimentary Basin (WCSB).

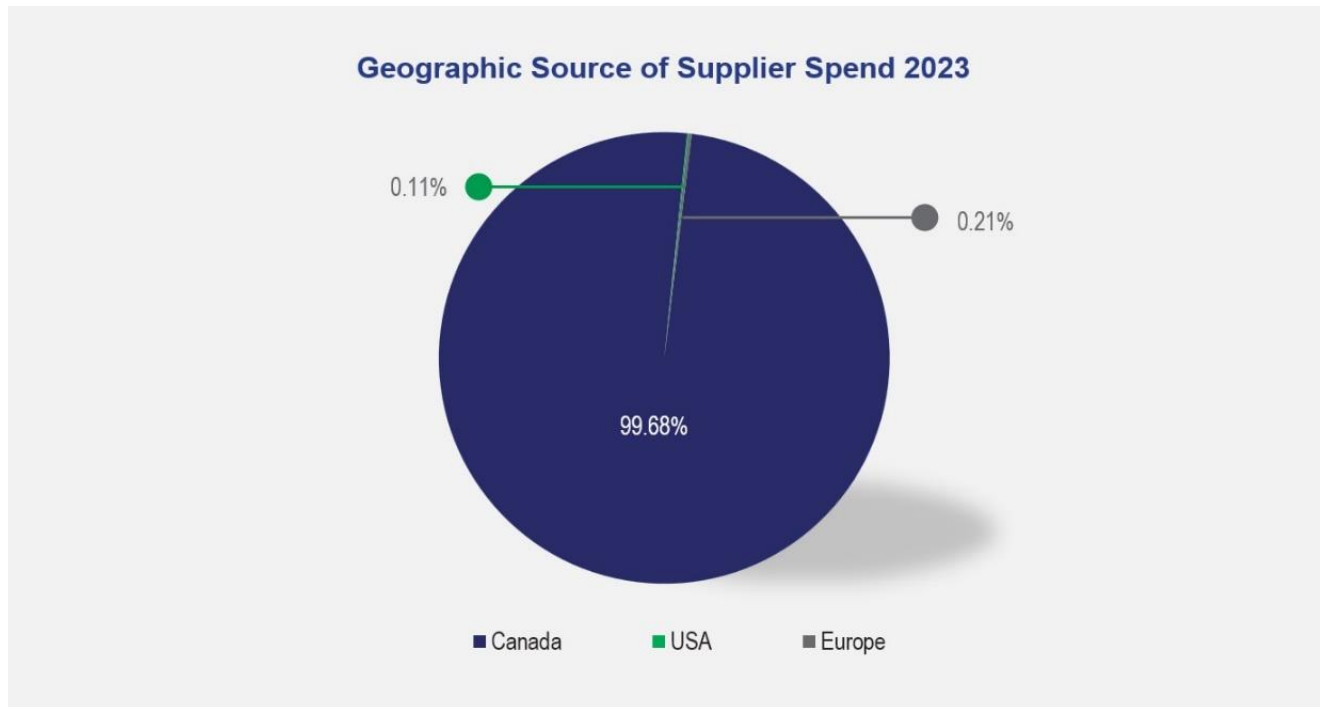
On December 31<sup>st</sup>, 2023, Tourmaline employed approximately 383 full-time employees and 642 consultants located among the Calgary office and various field locations within Alberta and British Columbia, Canada.

Additional information regarding our corporate structure and activities can be found in our 2023 Annual Information Form and annual financial statements and related management's discussion and analysis for the year ended December 31, 2023, which are posted on our website at [www.tourmaline.com](http://www.tourmaline.com) and filed on SEDAR+ ([www.sedarplus.ca](http://www.sedarplus.ca)).

### Supply Chain

Tourmaline works with many direct suppliers to source materials and services, most of which are primarily based in Canada and some located in other countries. Although the majority of our materials and services are sourced from suppliers located in Canada, we acknowledge that numerous suppliers provide us with products originating from other jurisdictions, each with their own global supply chains. Internally at Tourmaline, the procurement process is currently managed by department heads and their respective teams to onboard suppliers who align with Tourmaline's policies and procedures.

For the Reporting Period, our supplier spend by jurisdiction is represented below.



These suppliers are from a wide range of sectors, including Oil and Gas Equipment and Services, Construction and Engineering, Construction Materials, Oil and Gas Storage and Transportation, Oil & Gas Drilling, Oil & Gas Exploration and Production, Trucking, Diversified Support Services, Research and Consulting Services, Environmental and Facility Services, Energy, Government Entities and Non-Profit Organizations, Consumer Services, Technology Hardware & Equipment, Utilities, and more.

## POLICIES AND DUE DILIGENCE PROCESSES

We are in the process of reviewing our existing policies in the context of modern slavery considerations, and we plan to further embed a due diligence process into our operations that will support risk identification, mitigation, and remediation.

At present, we have a Human Rights Policy that demonstrates our commitment to prohibiting modern slavery practices. In addition, we have a Code of Business Conduct and Ethics that supports responsible and ethical business conduct, identification of unethical business conduct, and an existing grievance mechanism to report violations of the policies that are outlined below.

In line with our plan to integrate human rights within our due diligence processes, we aim to proactively establish and apply policies and procedures that firmly combat modern slavery risks. This will require developing the Supplier Code of Conduct and updating the Code of Business Conduct and Ethics to thoroughly address risks associated with modern slavery, liaising with stakeholders, and incorporating modern slavery considerations into our operations. We acknowledge the significance of protecting human rights throughout our supply chain and business operations, and we are devoted to executing definitive measures to reach this objective.

## Human Rights Policy

Tourmaline has adopted a Human Rights Policy which ensures that all agents on behalf of Tourmaline uphold and respect human rights as reflected in the UN Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms. A copy of our Human Rights Policy can be found on our website at [www.tourmaline.com](http://www.tourmaline.com).

Tourmaline ensures policy compliance through regular review and assessment of human rights policies, practices, and procedures, along with consultations with stakeholders. Presently, our monitoring of compliance with the Human Rights Policy involves annually requesting employees and contractors to acknowledge their adherence to all policies, including the Human Rights Policy.

## Code of Business Conduct and Ethics

Tourmaline requires the highest standards of professional and ethical conduct from our directors, officers and employees and has a Code of Business Conduct and Ethics Policy in which internal or external persons are encouraged to report a concern they might have about a violation of law, rules, regulations or this Code. A copy of our Code of Business Conduct and Ethics Policy can be found on our website at [www.tourmaline.com](http://www.tourmaline.com).

The Code of Business Conduct and Ethics also states that:

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*“Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to our reputation and continued success.”*

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In addition, whistleblower procedures are embedded into the Code of Business Conduct and Ethics Policy, including the phone number and online portal (via a third-party service called ConfidenceLine) where complaints can be reported, as follows:

To report any illegal or unethical behaviour anonymously, contact the ConfidenceLine at:

|                 |   |
|-----------------|---|
| <b>Phone</b>    | 1-800-661-9675  |
| <b>Internet</b> | <a href="https://tourmalineoil.confidenceline.com/">https://tourmalineoil.confidenceline.com/</a> |

Tourmaline prohibits retaliatory action against any employee who, in good faith, reports a possible violation. However, it is unacceptable to file a report knowing it to be false.

Tourmaline uses the third-party service (ConfidenceLine) to manage submissions reported through the ConfidenceLine portal and the phone number. These reports are addressed and investigated by an investigations committee. Confidentiality and legal obligations are maintained throughout the investigation process.

The Board monitors compliance with the Codes by requiring that all personnel affirm in writing his or her agreement to abide by the Codes when commencing service with the Company. Compliance is also reaffirmed annually by all individuals. In addition, management provides reports on compliance with the Codes to the Board on a regular basis.

## ACTIVITY AND SUPPLY CHAIN RISKS

To begin to understand our risk profile, we performed an initial review of potential modern slavery risks associated with key products, services, and geographic locations that relate to suppliers across our global supply chain. In reviewing the United Nations Global Compact Business & Human Rights Navigator, Global Slavery Index and UNICEF Global Datasets, we identified that our operations and supply chain are exposed to a low level of inherent risk of modern slavery.

When assessing and reviewing the risk of modern slavery, there are several factors tied to the country, industry, or operation that can influence the likelihood of such practices. These factors include the type of industry operations, workforce characteristics that might render workers susceptible, prevalent labour practices, geographically based regulatory landscapes, and human rights history.

The outcome of an inherent risk assessment does not necessarily imply that the operation is involved in modern slavery within their activities or supply chains. At Tourmaline, we understand the importance of initially evaluating inherent risks to determine where the risk of modern slavery is high. We then implement measures to minimize these risks.

To deepen our understanding of our inherent forced modern slavery risks, we engaged an independent third-party, outside of the Reporting Period, to undertake a risk assessment of our operational activity and a subset of our supplier base from which Tourmaline procured goods and services through the Reporting Period. As part of the inherent risk assessment, we worked with the third-party to map our operational activities and supplier sample to industry categories and sub-industries and identified the country of origin for each supplier based on available procurement data.

The third-party utilized its modern slavery risk assessment methodology to identify the inherent risk rating for each supplier. The risk assessment combined suppliers' geographic risk, industry risk and an industry controversy score to produce an inherent risk rating of low, low-medium, medium, medium-high, or high. As an inherent risk assessment, the results do not account for any specific due diligence or governance controls put in place by Tourmaline or specific suppliers to mitigate their specific modern slavery risks. The high-level findings of this assessment for our operations and supply chain are outlined in the following sections.

Currently, Tourmaline gathers information on suppliers and assesses it against its requirements through a third-party tool. The assessment covers various factors such as safety records, financial health, pricing, product quality, and past performance to determine their eligibility for the procurement. All the suppliers are required to onboard through this tool to collect information and require suppliers to conform to the criteria set out by Tourmaline. In the upcoming reporting period, Tourmaline is planning to expand the qualification criteria within the tool to include modern slavery requirements in the future procurement process for onboarding suppliers.

Additionally, we plan to engage with the highest-risk suppliers as identified through our risk assessment process. A Supplier Assessment Questionnaire will be administered via the tool to understand suppliers' approaches to combating modern slavery risks and further understand our supply chain and the geographical location of the sourced goods.

### **Risks of Modern Slavery in Our Activities**

Tourmaline directly employs workers across our business units in Alberta and British Columbia. Our operational sites are also supported by an indirect workforce employed by contractors to whom we outsource certain activities. Our employees in Calgary facilitate our day-to-day corporate operations. This part of our operations was assessed to have a low inherent risk of forced labour and child labour due to factors such as their location in Canada and the predominantly high skilled workforce and low labour intensity of their activities.

Our workforce at Alberta and British Columbia worksites were identified to have overall inherent risk of low-medium with medium risk of forced labour and child labour for construction activities and outsourced operations. This was primarily driven by characteristics inherent to the country-specific and industry-specific risk factors.

### **Assessment of Supply Chain Risk**

To gain a better understanding of the inherent risks in our supply chain, we followed a risk-based approach to select the suppliers for the sample assessed in the supply chain risk assessment. We recognize that inherent risk ratings are based on industry and geographic information about the supplier or activity, and do not consider specific due diligence or governance measures Tourmaline or individual suppliers have in place to mitigate potential risks of modern slavery. A further residual risk assessment would be required to determine whether these risk factors are mitigated or absent from Tourmaline's supply chain.

From our preliminary review, most of our suppliers who provide us with products or services are from low-risk countries. We found that this subset of our supply chain is exposed to low to medium level of inherent risk of forced and child labour due to the nature of the goods and services we procure, and our procurement footprint that sources goods from inherently low risk regions such as Canada, USA and Great Britain. None of the suppliers from the subset were identified to have a high or medium-high level of risk. Medium inherent risk of forced labour and child labour was identified in suppliers across industries such as Construction Materials, Diversified Metals & Mining, Health Care Supplies, Forest Products, Electronic Components, Electronic Equipment & Instruments, Construction & Engineering, Research & Consulting Services, Diversified Support Services, and Electrical Components & Equipment which were procured from Canada and Great Britain.

Although the information provided reflects the present understanding of modern slavery risks for Tourmaline, it only reflects the outcomes at a particular point in time and therefore requires further monitoring. We are actively pursuing further internal efforts to enhance the monitoring of supplier activities concerning modern slavery, and the classification of high-risk categories and countries might evolve as we gain additional insights over time.

## REMIEDIATION MEASURES

To date, we have not identified any instances of modern slavery in our activities or supply chains and therefore have not undergone steps to remediate any harm of modern slavery.

Our Code of Business Conduct and Ethics includes information on the ConfidenceLine hotline, providing a platform for employees, contractors, suppliers, and other third parties to make anonymous submissions via phone or the ConfidenceLine portal. This hotline serves as a mechanism to raise any concerns, including in relation to modern slavery. In the event of non-compliance, Tourmaline is committed to developing and implementing a corrective plan to improve and remedy the situation.

Tourmaline recognizes that efforts to prevent and reduce the risks of modern slavery can have the unintended consequence of contributing to a loss of income for the most vulnerable families. Remediation is a key step in this process and Tourmaline will endeavor to clearly outline the expectations for addressing remediation for individuals identified as victims of modern slavery in future reporting periods.

## EMPLOYEE TRAINING

Tourmaline directors, officers, employees, and consultants are required to certify that they have read, understand and will comply with our Code of Business Conduct and Ethics when joining Tourmaline and on an annual basis thereafter. Additionally, during the Reporting Period Tourmaline discussed the Act and its requirements with certain committees of the Board. We began raising awareness of our broader human rights policies and processes with regards to modern slavery with senior management and key business units. Tourmaline is planning to develop a training program for its officers, employees, as well as contractors in procurement and supply chain roles. Furthermore, Tourmaline is dedicated to enhancing the capacity of our staff to comprehend, identify, and effectively manage the risks of modern slavery within our operations and throughout our supply chains.

## ASSESSING EFFECTIVENESS

Tourmaline has not yet implemented a system to evaluate how effective our efforts are in mitigating the risks of modern slavery. We are aware of our responsibility in identifying and reporting these risks within our operations and supply chain. Our aim is to consistently enhance our capacity to gauge the effectiveness of these measures.

## APPROVAL AND ATTESTATION

This Report was approved by Tourmaline's Board of Directors in respect of the Company and its subsidiaries listed above on May 1, 2024 pursuant to paragraph 11(4)(b)(ii) of the Act and has been filed with the Minister of Public Safety and Emergency Preparedness.

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 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 the authority to bind Tourmaline Oil Corp.

DATED at Calgary, Alberta, this 1<sup>st</sup> day of May, 2024.

Signed "*Michael L. Rose*"

Michael L. Rose

Chairman, President and Chief Executive Officer