



## **2023 REPORT:**

*Fighting Against Forced Labour and Child Labour in Supply Chains Act*

## INTRODUCTION

This Report constitutes the first report prepared by Wolf pursuant to Canada's new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").

This Report is made jointly by Wolf Investments Canada LP ("**WIC LP**") and its subsidiaries Wolf Midstream Canada LP ("**WMC LP**"), Wolf Pipeline Inc. ("**Wolf Pipeline**"), Wolf Carbon Solutions Inc. ("**Wolf Carbon**") and Wolf NGL Inc. ("**Wolf NGL**") for the financial year ending December 31, 2023 ("**Reporting Period**"). This Report sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by WIC LP, WMC LP, Wolf Pipeline, Wolf Carbon, Wolf NGL and their subsidiaries (collectively referred to as the "**Wolf Platform**" or "**Wolf**") or of goods imported into Canada by Wolf.

Wolf respects human rights and acts with integrity in its operations and supply chains. We approach our business relationships reflecting a commitment to act ethically and responsibly.

### **Steps to prevent and reduce risks of forced labour and child labour:**

In general terms, Wolf took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- established an internal working group comprised of Wolf management representatives from supply chain, legal and human resources to review the impact of the Act on Wolf and assess the effectiveness of the actions taken to date to address the risks of modern slavery;
- began the process of mapping our supply chains;
- conducted an initial internal assessment of the risks of forced labour and/or child labour in our activities and supply chains and initial findings indicate that risk is low having regard to Wolf's business;
- adopted a Supplier Code of Conduct and strengthened our Code of Business Ethics;
- strengthened our standard form supplier contract terms by requiring suppliers to comply with modern slavery-related laws and our new Supplier Code of Conduct;
- developed a supplier questionnaire relating to modern slavery, human rights and supply chain risks for screening our suppliers that has been integrated into our supplier management system; and
- our internal and external legal team provided training on the issues of forced labour and child labour for Wolf employees in the legal, supply chain, operations, accounting and human resources departments, as well as the executive leadership team.

These actions were applied broadly across the Wolf Platform. Details of the above actions are set out in this Report.

## STRUCTURE AND OPERATIONS

WIC LP is a private, Calgary-based limited partnership that, via subsidiaries, owns and operates midstream energy infrastructure assets in Western Canada. As limited partnerships, the affairs of both WIC LP and WMC LP are administered, managed and operated by their general partner, Wolf Midstream Canada GP Inc.

Wolf has three businesses: Pipeline, Carbon and Natural Gas Liquids (“NGL”). The three distinct businesses are operated by Wolf Pipeline, Wolf Carbon and Wolf NGL, respectively.

### Wolf Pipeline

Wolf Pipeline owns and operates the **Access Pipeline System**, a modern, high capacity pipeline system commissioned in 2007 with a 40-plus year life. The Access Pipeline System transports diluted bitumen blend from our shippers in the Christina Lake area of Northeast Alberta, providing direct access to the Edmonton upgrading, refining and pipeline markets, diluent transportation service and direct connections to diluent supply sources in the Edmonton and Fort Saskatchewan areas.

In 2022, Wolf Pipeline started construction on the **Net Zero Connector** system, a stand-alone 230-kilometer, 12-inch high vapour pressure liquids pipeline that connects the Alberta Industrial Heartland and Prentiss, Alberta. Net Zero Connector was completed and commissioned in 2023.

### Wolf Carbon

Wolf Carbon owns and operates the **Alberta Carbon Trunk Line (“ACTL”)** system, which is a carbon pipeline system that receives, compresses and delivers CO<sub>2</sub> to permanent storage or to operator facilities. ACTL can transport up to 14.6 million tonnes of CO<sub>2</sub> per year and is the backbone of an expandable network capable of facilitating carbon mitigation options for many Alberta industrial emitters over the long-term. ACTL plays a leading role in facilitating carbon emissions reduction strategies in the Alberta Heartland and in Central Alberta, providing solutions in carbon capture, transportation and sequestration.

**Wolf Lamont Carbon Hub**, a carbon sequestration project under development in Alberta’s Industrial Heartland (Edmonton region) is a collaboration with Whitecap Resources, the First Nations Capital Investment Partnership (Alexander First Nation, Alexis Nakota Sioux Nation, Enoch Cree Nation and Paul First Nation) and Heart Lake First Nation. **Wolf Central Carbon Hub**, a partnership with Whitecap Resources, is a second carbon sequestration candidate project, under evaluation, is proximate to ACTL and industrial emitters in the Red Deer region.

### Wolf NGL

Wolf **NGL North System** is a proprietary, integrated NGL recovery, transportation and separation infrastructure system located in Alberta that produces ethane, propane, butane and condensate. The **Wolf Recovery Facility 1**, located in Northeast Alberta, is an NGL recovery facility with an initial processing capacity of approximately one billion cubic feet of natural gas per day and recovers higher carbon NGL prior to downstream combustion. The majority of project construction occurred within 2022 and the recently completed NGL transportation system (Access NGL Pipeline) transports recovered NGL from **Wolf Recovery Facility 1** to the **Wolf Feedstock Separation** complex.

## SUPPLY CHAINS

Wolf strives to build relationships with key suppliers that align with its values. The vast majority of Wolf's tier 1 vendors are domiciled in Canada and the United States. However, some of our vendors supply Wolf with products that originate from other jurisdictions and have their own global supply chains. Wolf does not currently have visibility on its suppliers beyond the first tier of its supply chain.

The Net Zero Connector and NGL North projects completed in 2023 included all pipeline supply originating in Western Canada and the importation of various equipment components from the United States and Western Europe, with the most significant purchases being electric motor drives, compressors, pumps, valves, converters, filters and spare parts.

During the Reporting Period, Wolf's spend with international suppliers was approximately 6% of its total supplier spend. Of the international spend, approximately 99.9% was with suppliers headquartered in the United States and 0.1% was with suppliers headquartered in Western Europe.

Wolf is committed to conducting all its business ethically, including our contracting and procurement activities.

## POLICIES

Wolf is committed to a positive and sustainable culture that is supported by a socially responsible environment, health and safety management practices and public safeguards.

Wolf has several key policies and codes in place to achieve our commitments. During the Reporting Period, Wolf adopted a new Supplier Code of Conduct and strengthened its Code of Business Ethics. In addition, Wolf has Whistleblower Policy and Procedures that provide a method for Wolf personnel and suppliers to report any concern anonymously. Through effective policies, we can help identify, address, remedy and prevent potential human rights impacts, including modern slavery.

### **Code of Business Ethics ("COBE")**

The COBE applies to all of Wolf's directors, officers and employees and sets out fundamental principles to guide a wide range of business practices and procedures, including the following principles aimed at protecting human rights and complying with applicable labour laws, including those enacted to eradicate forced labour, child labour and human trafficking. The Wolf Platform is committed to:

- employing qualified workers who are legally authorized to work in our operating locations;
- working with vendors and subcontractors who are committed to conducting business with integrity and in compliance with applicable laws and regulations;
- not using or tolerating the use of forced or child labour;
- raising the importance of identifying and preventing forced labour, child labour and human trafficking; and
- ensuring legal and regulatory reporting requirements are met.

The COBE applies to every employee, as well as to management contractors and consultants acting in a capacity of a representative of, or an agent for, the Wolf Platform. Compliance with the COBE is a

condition of employment. Prior to the adoption of the Supplier Code of Conduct, a copy of the COBE was also typically provided to Wolf suppliers.

### **Supplier Code of Conduct (“SCOC”)**

The SCOC sets out our expectations of suppliers, vendors, contractors, service providers, manufacturers and distributors (collectively, “**Suppliers**”) with respect to critical issues, including human rights. The SCOC reflects our commitment to a culture of honesty, integrity and accountability. Suppliers are expected to conduct themselves in a way that maintains Wolf’s reputation and standards.

In respect of human rights and labour practices, the SCOC sets out Wolf’s expectation that Suppliers:

- ensure a safe workplace, free of harassment, discrimination, bullying, violence and intimidation;
- comply with applicable labour laws governing work hours and compensation, including minimum wage, overtime and benefit requirements;
- employ qualified workers who are legally authorized to work in the location of their employment and validate their workers’ eligibility status;
- not use or tolerate the use of any form of slavery, servitude, forced labour, child labour or human trafficking;
- ensure that any workers under the age of 18 years are not involved in night work or work that is mentally, physically, socially or morally dangerous to them and ensure that their employment does not interfere with their schooling;
- comply with all applicable laws and regulations governing freedom of association and collective bargaining;
- not use any form of labour or service under circumstances that could reasonably be expected to cause the worker to believe their safety or the safety of a person known to them would be threatened if they failed to provide the labour or service;
- not use any form of forced or prison labour, or require workers to surrender any government issued identification or passports, or require workers to pay recruitment or other fees;
- take appropriate steps to raise awareness of forced labour and child labour to their workforce; and
- be informed by the principles set out in the United Nations *Guiding Principles on Business and Human Rights* and the International Labour Organization *Declaration of Fundamental Principles and Rights at Work*.

During the Reporting Period, it was mandatory for all Wolf employees as well as certain key consultants to be informed by the SCOC. In 2024, it will be Wolf’s expectation that all suppliers comply with the SCOC.

### **Whistleblower Policy and Procedures**

Wolf is committed to providing access to remedy employee concerns through effective grievance mechanisms. Our Whistleblower Policy and Procedures offers confidential access to the Wolf Board Chair, if a director, officer, employee, consultant, contractor or agent of Wolf believes there has been a violation of the COBE or suspects any breach. The Whistleblower Policy allows grievances to be reported confidentially and without fear of reprisal. The grievances can be reported openly, confidentially or anonymously through the Confidence Line, which is managed by outside, independent service providers. The Wolf Board Chair and General Counsel of Wolf will receive, investigate and act on complaints and

concerns regarding questionable activities that may be in contravention of Wolf's policies, subject to conflicts of interest.

To prevent non-compliance with the SCOC, our Confidence Line also allows any individual, including suppliers, to report instances where the above SCOC principles are not being respected.

## **DUE DILIGENCE PROCESSES**

During the Reporting Period, we continued to develop our responsible business conduct and due diligence processes in relation to modern slavery in our business and supply chains. We strengthened our standard form supplier contract terms by introducing requirements designed to mitigate against the risks of modern slavery. Beginning in 2024, our supplier standard contracts will require suppliers to comply with the following:

- comply with and procure goods and/or perform services in strict accordance with the SCOC, and ensure that the principles set forth therein are followed with respect to the utilization of any employees, subcontractors or suppliers;
- not use any goods or materials in connection with performing the contract that it knows or should reasonably suspect have been sourced or made using any form of modern slavery;
- take appropriate steps to raise awareness of modern slavery issues to its employees, agents and subcontractors; and
- provide to Wolf or its agent, upon request, information to assist Wolf in undertaking due diligence on its supply chain, including by way of a questionnaire issued periodically.

Wolf will continue to monitor its modern slavery risks and endeavour to embed and adopt practices to reduce risks.

As a part of our commitment to assessing and reducing the risks of modern slavery, during the Reporting Period we created a targeted supplier questionnaire relating to modern slavery, human rights and supply chain risks. Beginning in 2024, Wolf's prospective suppliers will be required to complete the supplier questionnaire in order to assist Wolf in identifying modern slavery risks within our supply chain. We anticipate requiring existing suppliers to complete the questionnaire when their contracts are renewed.

## **RISKS OF MODERN SLAVERY**

Our workforce that consists of office workers and skilled energy industry workers are all based in the Province of Alberta. Therefore, we consider that there is a low risk of modern slavery risks in our direct operations. In addition, all site operational and office staff are hired in accordance with Platform-wide standard policies, and all employees and contractors have written employment letters and contracts that conform to applicable laws and regulations.

In terms of our supply chain, Wolf took steps during the Reporting Period to begin to map and understand the supply chain by consolidating and manually assessing our lists of tier 1 vendors.

As the Wolf Platform sources all of its equipment and other supplies from vendors headquartered in Canada, the United States and Western Europe, we consider the risk of modern slavery in the first tier of our supply chain to be extremely low. Wolf anticipates using the responses from our newly developed supplier questionnaire to continue to understand and identify potential risks in our supply chain.

## MANAGING MODERN SLAVERY RISKS

As disclosed above, in order to manage any risk of forced labour or child labour in our operations or supply chain, we have strengthened our standard form vendor contract terms and conditions, and in 2024 will begin to require vendors to abide by our new Supplier Code of Conduct in addition to our Code of Business Ethics. We have also developed and deployed vendor questionnaire to allow us to better map and understand the risks in our supply chain.

In addition, during the Reporting Period, we established an internal working group comprised of Wolf management representatives from supply chain, legal and human resources to review the impact of the Act on Wolf and assess the effectiveness of the actions taken to date to address the risks of modern slavery. In addition to the amendments to our existing policies and procedures described above, the working group continues to assess opportunities for changes to its current framework to manage modern slavery risks.

## REMIEDIATION MEASURES

During the Reporting Period, Wolf did not identify any forced labour or child labour in its operations or supply chain. As a result, we have not had to take any measures to remediate any forced labour or child labour.

If we identify any instances where we have caused or contributed to potential instances of modern slavery and human rights impacts, we will take immediate action to investigate and remediate the situation. Our approach will be guided by what is in the best interests of the affected individual and the law.

Through grievance mechanisms, we are committed to providing access to remedies. Our Whistleblower Policy allows for grievances to be reported confidentially and without fear of reprisal. We are dedicated to investigating complaints. The central principle of any response to a complaint is ensuring individuals are not put at risk of further harm.

## TRAINING

In 2023, Wolf's internal and external legal team provided tailored training to employees in the legal, supply chain, operations, accounting and human resources departments, as well as the executive leadership team. The training covered a range of topics including the purpose and scope of the Act, international human rights frameworks, statistics related to modern slavery, the meaning and indicators of forced labour and child labour and measures to prevent such practices and steps to prevent and reduce modern slavery risks in the supply chain, including an overview of Wolf's governance framework and policies.

## ASSESSING OUR EFFECTIVENESS

Wolf introduced a number of measures during the Reporting Period to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. As this is the first year of the Act coming into force, we have not yet assessed the effectiveness of our policies but anticipate doing so going forward using similar methods to how we assess the effectiveness of our other critical policies.

## APPROVAL AND ATTESTATION

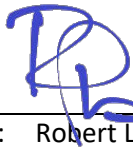
This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the board of directors of Wolf Midstream Canada GP Inc. in its capacity as general partner of Wolf Investments Canada LP on March 20, 2024.

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 herein.

I make the above attestation in my capacity as President & CEO and as a director of the board of Wolf Midstream Canada GP Inc. for and on behalf of the board of Wolf Midstream Canada GP Inc.

I have the authority to bind Wolf Midstream Canada GP Inc.

Per:



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Name: Robert Lock  
Title: President & CEO, and Director,  
Wolf Midstream Canada GP Inc.  
Date: April 25, 2024