



## MODERN SLAVERY REPORT (2024)

### *Introduction & Summary*

This modern slavery report (“**Report**”) is made by Connacher Oil and Gas Limited (“**Connacher**” or the “**Corporation**”) for the financial year ending December 31, 2024 (the “**Reporting Period**”). Connacher is a privately held corporation, incorporated pursuant to the *Canadian Business Corporations Act*, and is considered a reporting entity under the *Fight Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) as a corporation with a place of business in Canada, holding more than \$20 million in assets and generating more than \$40 million in revenue in the Reporting Period.

Connacher is committed to the health and safety of our workforce in compliance with all applicable laws, including the Act, and the prevention of any form of worker exploitation including slavery, servitude, forced labour, child labour and human trafficking (together “**Modern Slavery Practices**”).

During the Reporting Period, Connacher continued to advance the enhancement of its policies, procedures and actions taken to prevent Modern Slavery Practices in its operations and supply chain, including:

- reviewing the effectiveness of its governance structure, policies and procedures in identifying and preventing Modern Slavery practices;
- revising certain policies and procedures including the Board of Directors Terms of Reference and Code of Ethics (the “**Code**”) to specifically address Modern Slavery Practices; and
- risk-mapping the Corporation’s direct, tier 1 suppliers (“**Tier 1 Suppliers**”) and self-assessing those suppliers deemed to pose the most significant risk, based on jurisdiction and total spend in the Reporting Period; and
- initiated an evaluation of a voluntary first-time training program for implementation in calendar year 2025.

Based on Connacher’s risk mapping and to the best of the Corporation’s knowledge, Connacher is not aware of suppliers or goods in our operations or Tier 1 Suppliers which present a high-risk potential of Modern Slavery Practices. Connacher acknowledges limited visibility into its supply chain beyond Tier 1 Suppliers but believe, to the best of the Corporation’s knowledge, the risk of Modern Slavery Practices in its operations to be low.

### *Connacher Structure, Activities & Supply Chains*

Connacher is an Alberta-based *in situ* oil sands producer and marketer of bitumen, building reliable Canadian energy projects. The Corporation’s head office is located at Suite 500, 250 – 6<sup>th</sup> Avenue SW Calgary Alberta, and its sole asset is a 100 per cent interest in the Great Divide 78,000 acres of oil sands leases near Fort McMurray, Alberta. Connacher’s two producing projects at Great Divide are known as Pod One and Algar. As at the end of the Reporting Period, Connacher employed approximately 137 full-time permanent employees and engaged approximately 8 direct contractors. The Corporation holds a 100% equity interest in Great Divide Midstream GP Inc., the general partner of Great Divide Midstream Limited Partnership, which holds certain midstream assets of the Corporation.



During the Reporting Period, Connacher purchased products and services from approximately 678 direct Tier 1 Suppliers. Approximately 99% of this spend was from suppliers based in Canada and 1% of this spend was from US based suppliers.

### ***Policies, Due Diligence Processes & Steps Taken to Reduce Risks***

The Corporation has adopted Board-approved policies with respect to ethical business conduct. These policies are reviewed and updated on an annual basis or as required by senior management and the board of directors (the “**Board**”), as appropriate. The foundational policies and standards that set out our commitment to human rights and addressing risk of forced labour and child labour are described below.

CODE OF ETHICS	<p>Outlines our commitment to a culture of honesty, integrity, transparency, and accountability and promoting high standards of professional ethical conduct. The Code defines the standards we expect all our officers, employees, consultants and directors to meet. It specifically addresses the Corporation’s prohibition of Modern Slavery Practices in our operations.</p> <p>The Code also outlines our expectations from suppliers, contractors, customers, and other business partners to develop and enforce policies and/or practices that are consistent with the Code and its associated requirements that will apply to their staff providing services for or on behalf of Connacher.</p>
REPORTING OF INAPPROPRIATE ACTIVITY (WHISTLEBLOWER) POLICY	<p>Describes the procedures through which all officers, employees and consultants may report any concerns regarding the manner in which the Corporation conducts its business. The policy is intended to promote a workplace environment and a venue to voice concerns, free of any discrimination, retaliation, or harassment.</p> <p>The policy notes how to raise a potential concern pertaining to internal controls, reporting of fraudulent financial information, a violation of law by the Corporation, a substantial mismanagement of the Corporation’s resources or other violation of the Code; and the processes at Connacher for investigating such reports.</p>
RESPECTFUL WORKPLACE POLICY	<p>Outlines our commitment to maintaining a workplace that is free from all forms of harassment, including intimidation, threats, and acts of violence.</p>

Connacher recognizes the importance of the personal dignity of all individuals and respecting human rights, including the rights of our employees, our suppliers’ workforce, and the communities in which we operate. We also expect our suppliers and contractors to respect human rights.

The labour and employment laws and standards of Canada and Alberta act as a primary defense against Modern Slavery Practices and Connacher complies with all applicable laws and employment standards and requires the same by our Contractors. To prevent and reduce the risk of forced labour child labour in our operations, we have human resources controls in place for recruitment and onboarding new employees and reviewing employees’ wages and salaries with industry benchmarking surveys. Our employee induction processes also ensures that new employees confirm they have read and understood our policies and standards.



As outlined in our Code and Respectful Workplace Policy, we support the *Canadian Human Rights Act* and expect all employees or persons related to or dealing with the Corporation to abide by the human rights statements adopted by the Corporation. We also provide an external independent

whistleblower service known as ConfidenceLine, which is available to our employees and contractors to raise concerns on an anonymous basis.

In addition, in the Reporting Period, Connacher amended its Board of Director's Terms of Reference to expressly include the obligation to annually prepare, review and approve this Report in compliance with the Act.

### ***Risk Identification in Operations & Supply Chains***

In 2024, Connacher purchased products and services from approximately 678 Tier 1 Suppliers, which materially related to Canadian-based suppliers (99%). The remaining 1% was sourced from the United States of America.

Key categories and distribution of expenditures included:

- Materials (22%) – diluent and chemicals costs for operations
- Logistics (12%) – transportation costs (trucking, pipeline)
- Services (16%) – specialist operational support costs (labor and professional consultants)
- Energy (5%) – purchase of electricity, natural gas, and various fuels
- Construction, Machinery, and Maintenance (26%) – capital and maintenance costs related to facilities
- Other (19%) – remaining costs, including but not limited to insurance, tax, royalties

### ***Measures Taken & Remediation***

During the Reporting Period, Connacher continued to advance the enhancement of its policies, procedures and actions taken to prevent Modern Slavery Practices in its operations and supply chain, including:

- reviewing the effectiveness of its governance structure, policies and procedures in identifying and preventing Modern Slavery practices;
- revising certain policies and procedures including the Board of Directors Terms of Reference and Code to specifically address Modern Slavery Practices;
- risk-mapping the Corporation's Tier 1 Suppliers and self-assessing those suppliers deemed to pose the most significant risk, based on jurisdiction and total spend in the Reporting Period; and
- initiated an evaluation of a voluntary first-time training program for implementation in calendar year 2025.

As Connacher has not found evidence of Modern Slavery Practices in its operations or Tier 1 Suppliers, we have not taken remediation measures, beyond those set out herein.

### ***Training***



All staff of Connacher must annually acknowledge they have read and understood the Code and its associated policies and procedures. At the end of the Reporting Period and in calendar year 2025 Connacher worked to initiate an evaluation of a forced labour and child labour risk awareness training program. The training program is anticipated to describe the types of forced labour or child labour practices and requirements of the Act. The training program is anticipated to be deployed in calendar year 2025 on a voluntary basis and made mandatory should Connacher become aware of areas of increased concern based on the Corporation's risk-based review.

### ***Assessment of Effectiveness***

Connacher is committed to assessing the effectiveness of its practices and policies and will seek to continue to mature its response to Modern Slavery Practices. The Board shall receive an annual review of the assessment of risk of Modern Slavery Practices in the Connacher's operations and supply chains, and the effectiveness of Connacher's procedures. In addition, Connacher shall:

- promptly investigate any complaints received through reporting mechanisms described herein;
- monitor and risk assess our operations and supply chains on an ongoing basis; and
- annually review Connacher's policies relating to Modern Slavery Practices, and in relation to existing and new international benchmarking frameworks.

### ***Approval & Attestation***

This Report was approved pursuant to paragraph 11(4)(a) of the Act by Connacher's Board of Directors, effective April 17, 2025.

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 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 respect for the purposes of the Act, for the reporting year listed above. I have the authority to bind Connacher Oil and Gas Limited.

Full Name: Bill McCaffrey  
Title: Chairman of the Board  
Date: April 17, 2025

Signature: "*Bill McCaffrey*"