



FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT FRONTERA ENERGY CORPORATION REPORT – REPORTING YEAR 2024

1. Introduction

Frontera Energy Corporation (hereinafter “**Frontera**” or the “**Company**”) is a company listed on the Toronto Stock Exchange (“**TSX**”) under the ticker symbol “**FEC**” and incorporated under the laws of the Province of British Columbia, Canada. It is engaged in the exploration, development, production, transport, storage and sale of crude oil and natural gas in South America, including related investments in both upstream and midstream facilities.

The Company presents this report, which indirectly includes its subsidiaries, highlighting the actions implemented throughout the organization to respect human rights and prevent any forms of child labour and all forms of modern slavery in its supply chain. This report includes the implementation of policies, procedures and regulations applicable to Frontera (in its operations in Colombia and Ecuador), its contractors throughout its supply chain, and other parts of the business and supply chains, pursuant to the requirements of Section 11.3 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (hereinafter the “**Act**”) on reporting content.

2. General overview of Frontera Energy Corporation

At Frontera, we seek to build long-term relationships with suppliers who share our values of integrity, sustainability, commitment and respect, and who meet our standards for sustainability, ethics and compliance, human rights and local laws. Our sourcing strategy prioritizes suppliers with strong corporate responsibility and sustainability practices, which exceed minimum standards, embrace corporate ethics, promote safety, and employ these values in developing their workforce.

In the framework of responsible business conduct and in developing its operations, Frontera updated and defined a sustainability strategy establishing the three objectives listed below, from which commitments and actions are defined:

1. To respect human rights and improve the economic and social well-being of key stakeholders.
2. To encourage the Company’s growth and competitiveness by managing strategic risks with sustainability and responsible business criteria.
3. To conduct an environmentally and energetically efficient operation by maximizing the use of resources and waste.

The Company’s commitment to ethical practices begins with Frontera’s board of directors (the “**Board of Directors**”), which oversees our strategies, policies and programs related to corporate responsibility, sustainability, human rights and social impact. Our executive committee reviews and develops sustainability policies and objectives, monitors



performance, and addresses key issues and trends.

2.1. Description of activities

We have a diversified asset portfolio, composed of 22 exploration and production blocks in Colombia, Ecuador, and Guyana, as well as pipelines, palm oil plantations and port facilities¹ in Colombia.

- 1 Operations in Colombia:
38,623² barrels/day average production
6 blocks in exploration phase
12 blocks in production phase
1 block in exploration and production phase
- 2 Operations in Ecuador:
1,665³ barrels/day average production
2 blocks in exploration phase with a partner
- 3 Operations in Guyana:
1 block in exploration/evaluation phase with a partner

2.2. Structure of Frontera operations

VALUE CHAIN:

Upstream exploration

- 8 onshore blocks in exploration phase
- 1 onshore block in exploration and production phase
- 1 offshore block in exploration/assessment phase
- Net proved reserves (1P): 92.3 MMboe
- Gross reserves P1 + probable (P2): 151.3 MMboe

Onshore production

- 12 blocks in crude oil production
- 40,288 bbl/d of crude oil production
- 2 blocks in gas production
- 3,278 mcf/d of natural gas and 1,837 boe/d of natural gas liquids

Infrastructure:

- 99.97% equity interest in Sociedad Portuaria Puerto Bahia S.A., owner of a port facility

¹ Sociedad Portuaria Puerto Bahia S.A.

² Including 25,329 bbl/d of heavy crude oil, 10,882 bbl/d of light and medium crude oil, 3,278 mcf/d of conventional natural gas, and 1,837 boe/d of natural gas liquids.

³ Including 1,665 bbl/d of light and medium crude oil.



in Cartagena, Colombia.

- 100% equity interest in Agro Cascada S.A.S., which operates a reverse osmosis water treatment facility (“**SAARA Facility**”).
- 100% equity interest in Promotora Agrícola de los Llanos S.A., which operates a palm oil business located in the municipality of Puerto Gaitan, in the department of Meta, Colombia.

2.3. Description of Frontera’s Supply Chain

The Company’s supply chain consists of different suppliers of goods and/or services that provide their services directly or indirectly to the business. In the 2024 fiscal year, the participation of national contractors or suppliers in Colombia was 99.4%, while 0.6% of purchases and services were provided by international suppliers and contractors.

As outlined in the sections below, Frontera advances its due diligence processes in order to strengthen responsible business conduct in its suppliers and/or contractors, with special focus on those related to the following segments:

- Station operation and maintenance contractors.
- Drilling and well services contractors.
- Private security and surveillance contractors.
- Civil engineering and metalworking service contractors.
- Accommodation, staff transportation and general services contractors.

The above focus areas are chosen due to the volume of work related to these services and contractors or suppliers, who have a direct relationship with the communities that are part of the areas of direct influence of Frontera’s operations.

3. Measures taken to prevent and reduce forced and child labour

In compliance with its Corporate Human Rights Policy, the Company has implemented measures to prevent human rights violations from arising from its operations. In addition, Frontera has adopted responsible business conduct measures, monitoring the impacts on individuals directly and indirectly linked to its activities.

For the purposes of this report, we will present the actions related to labour practices that ensure decent, fair and equitable working conditions, mitigating the potential risks related to modern slavery, forced labour and child labour.

The above-mentioned actions are detailed below.

3.1. Update in risk identification and assessment in 28 macro-processes: identifying actions that have an impact on human rights

For Frontera, respect for human rights is a key issue for which all areas of the Company are responsible. Therefore, in compliance with ISO 31000:2018, Frontera updated the risks in its



macro-processes in 2024, identifying operational threats or possible impacts in terms of violation of fundamental rights of its employees and of the individuals that take part in its supply chain. This includes identifying threats to the right to life, decent work and fair conditions, as well as the prevention of social conflict and the promotion of dialogue with the communities in the areas of influence where the Company operates.

Several controls and measures have been implemented to mitigate these risks, which ensure the execution of processes that focus on risk prevention and/or management.

3.2. Management of safe conditions in working environments

The principles of Convention 155 concerning Occupational Safety and Health issued by the International Labour Organization (ILO) state that actions aimed at promoting health and safety in the work environment reduce the risks associated with forced labour.

In relation to occupational health and safety, Frontera is certified with ISO 45001, ISO 39001, and PCOS (Healthy Organizations Certification Program). As part of these guidelines, the Company has established a Corporate Health, Safety, Environment, and Quality Policy (the “**HSEQ Policy**”), which seeks to ensure safe working conditions and compliance with regulations and standards within the Company, its subsidiaries, and in its supply chain. The HSEQ Policy promotes due diligence actions, which are audited by external certifying organizations, in order to ensure that the companies linked to Frontera’s supply chain can adequately identify hazardous conditions and tasks for their workers. This ensures the implementation of protection protocols and compliance with international regulations and standards regarding the allocation of personal protective equipment as required by specific roles.

3.3. Prevention of labour risks

Frontera is committed to ensuring decent working conditions for all employees and individuals employed by companies that are part of its supply chain.

The selection and recruitment processes, for both direct personnel and third parties, comply with the applicable legislation in each country in which Frontera operates, and respects the working conditions freely and voluntarily agreed upon between workers and their respective employers.

In accordance with the above, and in relation to the companies that are part of the supply chain, Frontera has a labour strategy composed of five principles:

1. Compliance with legal and extra-legal obligations in labour matters determined by Frontera;
2. Verification of compliance (audits);
3. Healthy environments free of labour and sexual harassment acts and behaviors;
4. Union relations; and
5. Human rights.

Regarding compliance with legal and extra-legal obligations, Frontera includes, for instance,



a labour annex that is an integral part of the commercial contracts entered into with all its contractors (the “**Contractual Labour Annex**”), which details the obligations that contractors must comply with, and which must have their own contractors and subcontractors comply with. The main purpose of this Contractual Labour Annex is to ensure that labour practices comply with and even surpass the requirements of Colombian labour law, as well as to guarantee the respect for human rights and the express and clear prohibition of practices related to modern slavery, forced labour and child labour.

This Contractual Labour Annex puts into practice the fundamental principle of respect for human rights, which prohibits practices that may be considered forced labour, such as withholding wages, failure to make payments related to social security, among others. The Contractual Labour Annex requires Frontera’s contractors to comply with the provisions of Colombian labour legislation regarding working hours, work shifts, payment of wages as agreed with their workers and in accordance with each worker’s role; access to personal labour information such as labour contracts, pay slips, payment statements and proof of affiliation to the general health system, as well as free and informed agreements to establish any kind of labour relationship, among others.

Audits are carried out to corroborate compliance with the obligations described above, which include, but are not limited to (i) the management and placement of job vacancies through the Public Employment Service (Law 1636 of 2023 in Colombia), which allows free and voluntary access to job offers for all inhabitants; (ii) the creation and management of coexistence committees, a channel through which companies that are part of Frontera’s supply chain must receive and process complaints of harassment at work and conduct, implement training processes for their workers, and ensure healthy environments; among other aspects.

Where non-compliance may be detected through these audits, the contractor must implement action plans to correct the deviation within a specified period of time. If the non-compliance persists or if no appropriate corrective measures are taken, the fines and penalties established in the corresponding commercial contract will be imposed, or Frontera will proceed to unilaterally terminate the contract.

In 2024, 570 audits were carried out, out of which 227 were conducted on 140 contractors and 33 subcontractors in relation to labour matters. In the course of these actions, no evidence was observed of events related to forced labour or child labour.

Additionally, Frontera requires suppliers and contractors to comply with labour legislation standards, as well as to adopt effective measures to prevent child labour and forced labour, through contract clauses.

As part of the due diligence process, Frontera performs pre-interventions (before the execution of the service related to the commercial contract) in labour and public employment service matters, which allows the Company to pre-emptively detect potential breaches in order to take preventive actions and promote compliance with suppliers’ obligations upon executing services related to the commercial contract.

By means of this Contractual Labour Annex, Frontera reaffirms its commitment to the fundamental values of human and labour rights, ensuring that its operations are conducted



ethically, responsibly and in accordance with applicable laws.

3.4. Due diligence policies and processes against forced and child labour

In the year 2019, Frontera published its commitment to respect and promote human rights through its human rights declaration, and in December 2023, it established its Corporate Human Rights Policy. This policy reaffirms the Company's commitment to the respect for and promotion of human rights, in addition to declaring zero tolerance for human rights violations, especially any type of child labour, forced labour or human trafficking. This policy covers employees and third parties with whom we have significant dealings, including partners, suppliers, contractors, subcontractors, distributors, managers, advisors and other representatives acting on behalf of Frontera.

In light of the foregoing, Frontera establishes guidelines that respond to due diligence processes in the prevention of human rights violations, especially any form of forced and child labour, including:

- Contractual Labour Annex to contractor work agreement (human rights, prohibition of child labour and forced labour).
- Within the Contractual Labour Annex, a Certification of Compliance including Code of Conduct and Corporate Ethics and associated corporate policies and applicable law.
- Code of Conduct and Corporate Ethics Manual, Chapter 5, Communities and Human Rights.
- Human Rights Corporate Policy.
- Decalogue of Frontera's Provider - Contractual Labour Annex.
- Compliance Due Diligence Form.
- Social Investment and Community Aid Policy
- HSEQ Policy, as well as the respective contract compliance clauses.

3.5. Supply chains and third parties that perform activities involving a risk of forced or child labour and measures that Frontera has adopted to identify, assess and manage this risk

Frontera acknowledges the potential vulnerabilities in its supply chain that may account for risks of forced labour or child labour. Because of that, Frontera engages multiple suppliers and contractors, conducts random audits on health and safety, and labor practices, as well as initiating human rights training processes with some of them. Additionally, we conduct other activities to strengthen their human rights commitment, and work in accordance with them to execute the entrusted activities.

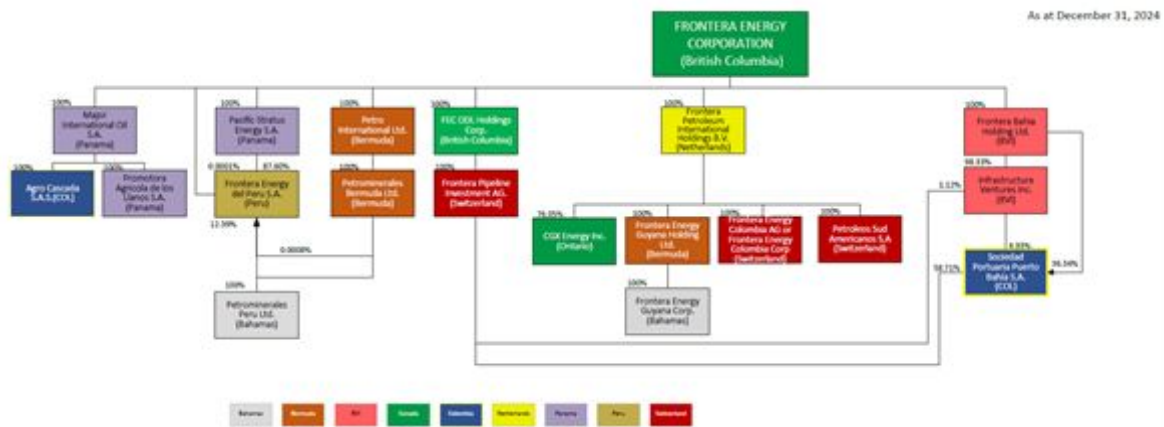
The latter occurs within the framework of Frontera's labour strategy in place for contractors which highlights compliance with legal and extra-legal requirements, pre-intervention and auditing practices, human rights, environments free of labour and sexual harassment behaviors, and union relations.



In line with this, all of Frontera’s contractors and subcontractors must comply with the Contractual Labour Annex of their corresponding commercial contract, which establishes the obligation to abide by the labour legislation in force for their corresponding jurisdiction.

Regarding union relations, the Company currently has a collective labour agreement with the Union of Workers of the Oil and Energy Industry of Colombia (“**UTIPEC**”) in place, through which UTIPEC and Frontera can be aware of alleged labour risks by contractors and suppliers, which enables Frontera to request explanations and corrective measures from the respective employers. The monitoring used by UTIPEC in the different locations where the Company operates in Colombia allows Frontera to review and resolve possible allegations in due course.

In joint ventures and subsidiaries



The subsidiaries of Frontera in Peru, Promotora Agrícola de los Llanos S.A., Agro Cascada S.A.S., Sociedad Portuaria Puerto Bahia S.A. and CGX Energy Inc. make efforts to prevent forced or child labour, and have not raised concerns related to these issues.

These subsidiaries have their own policies, procedures and regulations applicable to both their workers and their supply chain in order to identify, assess and manage risks related to violations of forced and child labour, both in their operations and in their supply chain.

3.6. Measures taken to redress any form of forced or child labour

At present, Frontera has processes for receiving concerns, petitions, complaints and claims, as well as a channel to report ethics and business behavior concerns through its Ethics Line. The Company also holds conversations with workers’ representatives through the coexistence committees and COPASST, as well as ongoing discussions with trade unions. These channels allow us to monitor and track compliance with working conditions freely and voluntarily agreed to by workers and their employers, as well as compliance with the current labour legislation.

When a complaint is received in the Ethics Line associated to a third-party contractor’s labour



practice, the Company's compliance team, as administrator of the Ethics Line, transfers it to the corresponding contract administrator and the labour relations team. These teams are responsible for following up on the actions defined by the third party involved.

3.7. Measures taken to remedy the loss of income of most vulnerable families resulting from any measures taken to eliminate the use of forced or child labour in their activities and supply chain

During 2024, no cases of forced or child labour were recorded through the channels provided by Frontera for this purpose. Frontera engages with its Ethics Line and professionals in the Company's corporate social responsibility and labour relations teams in each of the areas of operation and trade union organizations, among others, to track such cases. Accordingly, Frontera did not implement remediation actions regarding loss of income either in vulnerable families or in those communities that could be affected by the elimination of practices related to forced labour or child labour.

3.8. Training of employees on forced and child labour

During 2024, training, awareness, and communications were carried out for Frontera employees and contractors related to preventing actions that may lead to the violation of human rights, including on the following:

- ✓ Dissemination of the Corporate Human Rights Policy to the entire organization. This was accompanied by video training highlighting that respect for human rights is related to fair and egalitarian work environments, the promotion of innovation and growth, as well as treatment with dignity, respect and fairness in the organization's culture.
- ✓ Awareness-raising on commercial sexual exploitation of children and adolescents for personnel in charge of managing contracts with the supply chain related to Frontera's logistics and transportation processes.
- ✓ Awareness-raising for the implementation of good labour practices, within the framework of the Frontera Pro Contractors Forum, led by Frontera's labour relations team.
- ✓ Dissemination of the Contractual Labour Annex in informative and socialization meetings and labour forums with contractors, regarding compliance with labour obligations and the eradication and prohibition of forced labour and child labour.
- ✓ Awareness-raising on respect for human rights as a business practice, within the framework of the Frontera Pro Contractors Forum, with the participation of Frontera employees from the contracts administration team.
- ✓ In order to promote ethical conduct, anti-corruption and respect for human rights, Frontera organized the "C and D Week (Compliance and Human Rights)". During this



week, two sessions were held to raise awareness among employees about respect for human rights, the importance of making them visible in daily life, as well as the impact of violations on daily decision making, focusing the activity on responsible consumption practices and a culture of respect for human rights.

- ✓ Involvement in collective action initiatives that promote respect for human rights. Frontera participates as one of the private sector representatives in the Alliance for Integrity National Hub in Colombia, an initiative that seeks to improve business integrity through multi-stakeholder collaboration. This initiative fosters collective action between the private sector, the public sector and civil society; offers practical solutions to strengthen the compliance capabilities of companies and their supply chains; contributes to the improvement of framework conditions through dialogue between sectors; and provides opportunities for peer-to-peer learning and the exchange of knowledge and best practices.

3.9. How the Company assesses its effectiveness in ensuring that forced and child labour is not applied in its businesses and supply chains

Frontera ensures the effectiveness of its forced and child labour prevention processes by monitoring the following indicators:

- **Cases related to forced labour and child labour.** We analyze the number of cases of workplace harassment and/or child labour reported through the mechanisms related to the coexistence committees, COPAST and the Ethics Line.
- **Training for workers and contractors.** Annual training on the prevention of forced labour and child labour makes it possible to identify situations in which violations of forced labour and child labour occur, and therefore, prevent them during the development of activities throughout our supply chain. We analyze the number of training processes conducted with human rights workers, with emphasis on forced and child labour.

In accordance with the above, for the year 2024, the following data was obtained as indicators of the effectiveness of the implemented measures aimed at preventing forced and child labour:

- **Number of cases reported, managed, and closed related to forced labour: 0**
- **Number of cases reported, managed, and closed related to child labour: 0**
- **Number of findings related to forced and child labour recorded through labour audits conducted in the year: 0**
- **Number of training activities for workers and contractors: 6**, which are described below:

- ✓ Prevention of sexual exploitation of children and adolescents, designed for the Company’s logistics and transportation contract managers.
- ✓ Awareness-raising for the implementation of good labour practices, within



the framework of the Contractors' Forum organized by Frontera's labour relations team, as well as in informative and socialization meetings.

- ✓ Awareness-raising on respect for human rights as a business practice, within the framework of the Contractors Forum, with the participation of Frontera employees who have contract administration roles.
- ✓ Awareness-raising on the importance of respect for human rights and responsible consumption practices during the C and D week.
- ✓ Training on business, human rights and due diligence processes in the special passenger transportation industry.
- ✓ Participation in the Alliance for Integrity National Hub.

4. Approval

This report has been reviewed and approved by the Board of Directors of Frontera, the principal governing body of the entity that controls each entity included in this report, in accordance with section 11 (4)(b)(ii) of the Act.

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 contained in the report is true, accurate, and complete in all material respects for purposes of the Act, for the reporting year listed above, and that I have the authority to bind **FRONTERA ENERGY CORPORATION**.

A handwritten signature in black ink, appearing to read 'Orlando Cabrales Segovia'.

Orlando Cabrales Segovia
Chief Executive Officer & Director
Date: May 8, 2025